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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re:*

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**TWENTIETH MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD MAY 1, 2021 THROUGH MAY 31, 2021**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>May 1, 2021 through May 31, 2021</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$733,093.20 (80% of \$916,366.50)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$2,590.75 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twentieth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing May 1, 2021 through May 31, 2021 (the “**Application Period**”).

**Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$916,366.50 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$733,093.20.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$1,135.80. The blended hourly rate of paraprofessionals during the Application Period is \$268.54.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$2,590.75 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$2,590.75.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

#### **FILING AND SERVICE**

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$733,093.20 (80% of \$913,366.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$2,590.75 (100%), for a total amount of \$735,683.95, for the Application Period.

Dated: July 15, 2021  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants.*

**Exhibit A**

**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A001	Asset Analysis & Recovery	21.5	\$15,775.00
A004	Case Administration	4.0	\$4,247.50
A006	Employment / Fee Applications	2.8	\$1,181.00
A009	Meetings / Communications with AHC & Creditors	39.1	\$47,460.00
A015	Non-Working Travel (Billed @ 50%)	5.0	\$4,250.00
A019	Plan of Reorganization / Disclosure Statement	349.9	\$368,071.00
A020	Insurance Adversary Proceeding	709.4	\$475,382.00
		<b>1,131.7</b>	<b>\$916,366.50</b>

**Exhibit B**

**Summary of Compensation by Professional**

### SUMMARY OF COMPENSATION BY PROFESSIONAL

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims - 2019	\$1,700.00 \$850.00 <sup>2</sup>	117.3 5.0	\$199,410.00 \$4,250.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	31.0	\$34,100.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York - 1997	\$1,400.00	100.0	\$140,000.00
Craig J. Litherland	Partner / State of Texas – 1983 Supreme Court of Texas – 1983 U.S. Court of Appeals Fifth Circuit – 1984 U.S. District Court for the Southern District of Texas – 1985 U.S. Federal Court for the Eastern District of Michigan – 1995 District of Columbia - 2001 U.S. District Court for the Western District of Texas – 2008 Cherokee Nation – 2017	\$1,400.00	22.0	\$30,800.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	62.8	\$84,780.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	81.0	\$64,800.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia - 2019	\$725.00	103.7	\$75,182.50
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012	\$700.00	43.1	\$30,170.00

<sup>2</sup> Non-working travel is billed @ 50% of regular hourly rates



<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
	U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020			
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00	28.3	\$19,810.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia 2017	\$675.00	52.5	\$35,437.50
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	69.3	\$39,847.50
Alison Gaske	Associate / District of Columbia – 2016	\$575.00 <sup>3</sup>	65.0	\$37,375.00
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	88.7	\$44,350.00
Rachel Jennings	Associate / District of Columbia – 2017	\$425.00	7.9	\$3,357.50
Janet Sanchez	Associate / Commonwealth of Virginia – 2020	\$375.00	18.9	\$7,087.50
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia -2007	\$365.00	10.8	\$3,942.00
Rachael Lyle	Staff Attorney / State of Alabama – 2017 District of Columbia - 2018	\$310.00	15.1	\$4,681.00
Marnie Glaebberman	Staff Attorney / State of New York – 2007 District of Columbia – 2009	\$300.00	13.7	\$4,110.00
Tarsha Jones	Staff Attorney / State of Maryland – 2001 District of Columbia – 2006	\$300.00	11.1	\$3,330.00
Stephanie Colcock	Paralegal – Joined firm in 2020	\$330.00	44.3	\$14,619.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2017	\$315.00	30.2	\$9,513.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	80.5	\$18,515.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	27.6	\$6,348.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290.00	1.9	\$551.00
	<b>Totals</b>		<b>1,131.7</b>	<b>\$916,366.50</b>
	<b>Attorney Blended Rate</b>	<b>\$1,135.80</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$268.54</b>		

<sup>3</sup> Hourly rate change is reflective of Ms. Gaske's promotion effective as of 5/1/2021.

**Exhibit C**

**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Conference Calls / Court Solutions	\$70.00
Messenger & Delivery	\$77.08
Lexis	\$122.13
Pacer	\$365.40
Westlaw	\$1,956.14
<b>Total</b>	<b>\$2,590.75</b>

**Exhibit D**

**Time and Expense Detail**



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Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

July 14, 2021  
Invoice Number: 11323680  
Client Number: 1599  
Tax ID: 52-2283869

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**FOR PROFESSIONAL SERVICES RENDERED through May 31, 2021**

**Re: Ad Hoc Committee (Purdue)**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Purdue Bankruptcy	916,366.50	2,590.75	918,957.25
<b>Total</b>	<b>916,366.50</b>	<b>2,590.75</b>	<b>918,957.25</b>

TOTAL FEES \$ 916,366.50

TOTAL EXPENSES \$ 2,590.75

**TOTAL FEES AND EXPENSES \$ 918,957.25**

**FOR PROFESSIONAL SERVICES RENDERED through May 31, 2021**

**Purdue Bankruptcy**

**A001: Asset Analysis & Recovery**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Ogrey, S.	5/03/21	Revise master tracking sheet of cases against Debtors for insurance analysis purposes.	.70	161.00
Shore, R.	5/04/21	Review insurance recovery strategy.	.30	405.00
Hudson, J.	5/04/21	Analyze next steps for insurance recovery.	.30	217.50
Lyle, R.	5/06/21	Analyze Intralinks uploads for insurance-related documentation.	.50	155.00
Gilbert, S.	5/10/21	Analyze insurance recovery in relation to bankruptcy status.	.30	510.00
Shore, R.	5/10/21	Continue reviewing insurance recovery strategy.	.30	405.00
Hudson, J.	5/10/21	Analyze next steps for insurance recovery in light of status of bankruptcy negotiations.	.30	217.50
Grim, E.	5/10/21	Analyze next steps re insurance recovery.	.30	210.00
Wolf, D.	5/10/21	Review insurance recovery issues.	.30	210.00
Sanchez, J.	5/10/21	Review bankruptcy negotiation updates re insurance.	.30	112.50
Gaske, A.	5/10/21	Communicate with E. Kaminsky re certain insurance policies.	.60	345.00
Gaske, A.	5/10/21	Review status of insurance recovery and strategy.	.30	172.50
Hudson, J.	5/12/21	Analyze options for potential mediators on insurance issues.	.20	145.00
Gilbert, S.	5/17/21	Confer with bankruptcy team (S. Sraders, J. Sanchez) and insurance team (J. Hudson, A. Gaske, D. Wolf) re insurance recovery.	.80	1,360.00
Hudson, J.	5/17/21	Confer with bankruptcy (S. Gilbert, S. Sraders, J. Sanchez) and insurance team (A. Gaske, D. Wolf) re insurance recovery.	.80	580.00
Wolf, D.	5/17/21	Confer with S. Gilbert, J. Hudson, S. Sraders, A. Gaske, and J. Sanchez re insurance recovery strategy.	.80	560.00
Sanchez, J.	5/17/21	Confer with team re case status and strategy.	.80	300.00
Gaske, A.	5/17/21	Confer with bankruptcy (S. Gilbert, S. Sraders, J. Sanchez) and insurance team (J. Hudson, D. Wolf) re insurance recovery.	.80	460.00

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Name	Date	Services	Hours	Amount
Sraders, S.	5/17/21	Confer with S. Gilbert, J. Hudson, D. Wolf, A. Gaske, and J. Sanchez re current strategy and next steps.	.80	460.00
Gaske, A.	5/18/21	Analyze next steps re Kemper insolvency.	.10	57.50
Lyle, R.	5/20/21	Analyze documents in Kemper-Lumbermens insolvency.	.40	124.00
Lyle, R.	5/20/21	Research Kemper-Lumbermens claims process.	.50	155.00
Lyle, R.	5/21/21	Analyze Intralinks uploads for insurance-related documentation.	.60	186.00
Hudson, J.	5/24/21	Confer with bankruptcy (E. Grim, S. Sraders, J. Sanchez) and litigation team (R. Leveridge, J. Rubinstein, A. Gaske, E. Kaminsky) re insurance recovery status and strategy.	.10	72.50
Grim, E.	5/24/21	Confer with bankruptcy (K. Quinn, E. Grim, S. Sraders, J. Sanchez) and litigation team (R. Leveridge, J. Rubinstein, A. Gaske, E. Kaminsky) re insurance recovery status and strategy.	.10	70.00
Gaske, A.	5/24/21	Confer with bankruptcy (K. Quinn, E. Grim, S. Sraders, J. Sanchez) and litigation team (R. Leveridge, J. Rubinstein, J. Hudson, E. Kaminsky) re insurance recovery status and strategy.	.10	57.50
Lyle, R.	5/24/21	Analyze Intralinks uploads for insurance-related documentation.	.40	124.00
Sraders, S.	5/24/21	Confer with insurance and bankruptcy teams re next steps in insurance recovery.	.10	57.50
Gilbert, S.	5/25/21	Confer with insurance team re strategy.	.50	850.00
Johnson, K.	5/25/21	Review and organize recent insurance-related correspondence.	.30	69.00
Lyle, R.	5/25/21	Review new Intralinks uploads for relevant insurance-related documents.	1.70	527.00
Shore, R.	5/27/21	Confer with insurance team re status and strategy for insurance recovery.	.40	540.00
Shore, R.	5/27/21	Analyze intersection of insurance and bankruptcy issues.	.70	945.00
Shore, R.	5/27/21	Draft memorandum re aspects of bankruptcy case that relate to insurance recovery.	2.00	2,700.00
Hudson, J.	5/27/21	Confer with insurance team re status and strategy for insurance recovery.	.40	290.00
Rubinstein, J.	5/27/21	Confer with insurance team re status and strategy for insurance recovery.	.40	320.00
Wolf, D.	5/27/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, A. Gaske, and E. Kaminsky re insurance recovery strategy.	.40	280.00

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Name	Date	Services	Hours	Amount
Johnson, K.	5/27/21	Confer with insurance team re status and strategy for insurance recovery.	.40	92.00
Gaske, A.	5/27/21	Confer with insurance team re status and strategy for insurance recovery.	.40	230.00
Ogrey, S.	5/27/21	Review main bankruptcy, adversary, and SDNY dockets for filings for insurance analysis purposes.	.90	207.00
Sraders, S.	5/27/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, D. Wolf, M. Rush, A. Gaske, E. Kaminsky, K. Johnson, S. Martinez and S. Colcock re insurance recovery strategy.	.40	230.00
Kaminsky, E.	5/27/21	Confer with team re insurance strategy.	.40	200.00
Shore, R.	5/31/21	Finalize memorandum re aspects of bankruptcy case that relate to insurance recovery.	.30	405.00
<b>Project Total:</b>			<b>21.50</b>	<b>\$ 15,775.00</b>

**A004: Case Administration**

Name	Date	Services	Hours	Amount
Gilbert, S.	5/05/21	Confer with K. Feinberg re mediation.	.50	850.00
Gilbert, S.	5/05/21	Attend Chambers conference.	1.00	1,700.00
Grim, E.	5/12/21	Communicate with K. Quinn re outcome of mediation and next steps.	.30	210.00
Gilbert, S.	5/17/21	Confer with K. Feinberg re mediation issues.	.50	850.00
Sanchez, J.	5/20/21	Attend status conference re uncontested matters, matters in adversary proceedings and continued matters.	1.70	637.50
<b>Project Total:</b>			<b>4.00</b>	<b>\$ 4,247.50</b>

**A006: Employment / Fee Applications**

Name	Date	Services	Hours	Amount
Grim, E.	5/16/21	Revise March fee application.	.90	630.00
Holland, P.	5/18/21	Draft March fee statement.	1.30	377.00
Holland, P.	5/25/21	Finalize March fee statement.	.60	174.00
<b>Project Total:</b>			<b>2.80</b>	<b>\$ 1,181.00</b>



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**A009: Meetings / Communications with AHC & Creditors**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	5/03/21	Correspond with AHC re plan negotiations (1.2); telephone conference with S. Birnbaum re same (0.8).	2.00	3,400.00
Gilbert, S.	5/04/21	Confer with AHC re plan negotiations.	1.00	1,700.00
Gilbert, S.	5/05/21	Confer with AHC re attorney fee fund issues.	.50	850.00
Gilbert, S.	5/05/21	Confer with AHC re strategy.	1.40	2,380.00
Hudson, J.	5/05/21	Attend AHC meeting re insurance issues.	1.40	1,015.00
Grim, E.	5/05/21	Confer with AHC re plan negotiations and other issues.	1.40	980.00
Sraders, S.	5/05/21	Confer with AHC re latest developments, strategy, and next steps.	1.40	805.00
Gilbert, S.	5/06/21	Confer with AHC re open plan issues.	1.00	1,700.00
Hudson, J.	5/07/21	Attend AHC working group meeting re insurance issues.	1.20	870.00
Quinn, K.	5/10/21	Confer with client re status and strategy.	.90	990.00
Sraders, S.	5/10/21	Confer with AHC re outstanding issues with disclosure statement.	.60	345.00
Gilbert, S.	5/11/21	Confer with AHC re plan negotiations.	1.10	1,870.00
Quinn, K.	5/11/21	Participate in call with non-state members re open issues (partial).	.70	770.00
Sraders, S.	5/11/21	Confer with non-state AHC members re attorneys fees.	.80	460.00
Gilbert, S.	5/12/21	Confer with AHC re plan revisions.	.90	1,530.00
Gilbert, S.	5/13/21	Confer with AHC re plan strategy.	1.20	2,040.00
Gilbert, S.	5/14/21	Meet with AHC re plan.	1.50	2,550.00
Quinn, K.	5/14/21	Confer with non-state clients re fees distribution.	1.00	1,100.00
Quinn, K.	5/14/21	Confer with G. Cicero re follow up re conversation with clients.	.30	330.00
Grim, E.	5/14/21	Confer with non-states re attorney fee fund structure and criteria.	1.40	980.00
Gilbert, S.	5/17/21	Confer with AHC re plan.	.80	1,360.00
Grim, E.	5/18/21	Confer with non-states re attorneys' fee fund issues. (Partial)	.20	140.00
Sraders, S.	5/18/21	Confer with AHC non-state members re treatment of fees and expenses.	.90	517.50
Gilbert, S.	5/19/21	Meet with AHC re plan negotiations.	1.00	1,700.00
Hudson, J.	5/19/21	Attend AHC meeting re insurance-related status and strategy.	1.10	797.50

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Name	Date	Services	Hours	Amount
Sraders, S.	5/19/21	Confer with Ad Hoc Committee re status of ongoing proceedings.	.50	287.50
Gilbert, S.	5/21/21	Confer with AHC re new open plan issues.	2.00	3,400.00
Quinn, K.	5/24/21	Confer with AHC re plan and open issues.	2.00	2,200.00
Grim, E.	5/24/21	Confer with client re key voting issues in plan.	1.70	1,190.00
Sraders, S.	5/24/21	Confer with AHC re approval of plan documents.	1.70	977.50
Gilbert, S.	5/25/21	Confer with AHC re plan.	1.30	2,210.00
Gilbert, S.	5/25/21	Confer with non states re fee distribution issues.	1.00	1,700.00
Sraders, S.	5/25/21	Confer with non-state AHC members re fees.	1.00	575.00
Gilbert, S.	5/27/21	Confer with AHC and Pls re plan.	1.50	2,550.00
Gilbert, S.	5/28/21	Confer with AHC re plan provisions re creditor deals.	.70	1,190.00
<b>Project Total:</b>			<b>39.10</b>	<b>\$ 47,460.00</b>

**A015: Non-Working Travel (Billed @ 50%)**

Name	Date	Services	Hours	Amount
Gilbert, S.	5/26/21	Travel from White Plains, NY to Miami, FL after disclosure statement hearing.	5.00	4,250.00
<b>Project Total:</b>			<b>5.00</b>	<b>\$ 4,250.00</b>

**A019: Plan of Reorganization / Disclosure Statement**

Name	Date	Services	Hours	Amount
Sraders, S.	5/01/21	Revise analysis of third-party issues.	4.30	2,472.50
Gilbert, S.	5/02/21	Confer with G. Uzzi re plan.	1.00	1,700.00
Gilbert, S.	5/02/21	Confer with K. Eckstein re plan negotiations.	.50	850.00
Gilbert, S.	5/02/21	Confer with G. Uzzi and K. Eckstein re plan negotiations.	1.30	2,210.00
Sraders, S.	5/02/21	Analyze follow-up issues re third-party documents (0.5); draft analysis re same (1.9).	2.40	1,380.00
Gilbert, S.	5/03/21	Confer with E. Vonnegut (Davis Polk) re plan.	.50	850.00
Grim, E.	5/03/21	Research issues re plan treatment of third-party claims.	.50	350.00
Sanchez, J.	5/03/21	Review and analyze Debtors' documents (2.9); draft analysis re same (2.6).	5.50	2,062.50
Jennings, R.	5/03/21	Research plan issues related to co-defendants.	3.70	1,572.50
Hudson, J.	5/04/21	Confer with Debtors re AHC markup of plan documents.	.10	72.50

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Hudson, J.	5/04/21	Analyze requested revisions to insurance-related aspects of plan received from Debtors (S. Massman, D. Kratzer, E. Vonnegut, and Z. Levine) and Milbank.	.10	72.50
Sanchez, J.	5/04/21	Continue analyzing Debtors' documents for purposes of plan analysis.	4.20	1,575.00
Sanchez, J.	5/04/21	Confer with NAS re NAS claims and current reorganization plan.	.70	262.50
Sraders, S.	5/04/21	Review Debtors' documents to analyze co-defendant issues.	7.20	4,140.00
Gilbert, S.	5/05/21	Confer with A. Troop re plan negotiations.	.50	850.00
Gilbert, S.	5/05/21	Confer with A. Preis re plan negotiations.	.50	850.00
Gilbert, S.	5/05/21	Correspond with S. Birnbaum re plan.	.50	850.00
Gilbert, S.	5/05/21	Review and revise plan materials.	1.00	1,700.00
Litherland, C.	5/05/21	Communicate with K. Quinn, R. Shore, and others re discussion of plan provisions re insurance to minimize accessing coverage risks.	.20	280.00
Hudson, J.	5/05/21	Confer with Debtors (S. Massman, D. Kratzer, E. Vonnegut, and Z. Levine) and Kramer Levin (R. Ringer and C. Gange) re AHC markup to plan documents to cover insurance-related issue.	1.10	797.50
Hudson, J.	5/05/21	Revise draft statement in support of objection re insurance neutrality.	.30	217.50
Hudson, J.	5/05/21	Analyze requested revisions to insurance-related aspects of plan received from Debtors (S. Massman, D. Kratzer, E. Vonnegut, and Z. Levine) and Milbank.	.30	217.50
Hudson, J.	5/05/21	Review Debtors' final language to address insurers' neutrality objection.	.10	72.50
Grim, E.	5/05/21	Analyze research re plan third-party issues.	1.70	1,190.00
Grim, E.	5/05/21	Draft memorandum re plan third-party issues.	2.10	1,470.00
Grim, E.	5/05/21	Analyze updated proposal re shareholder insurance rights release.	.20	140.00
Wolf, D.	5/05/21	Revise plan documents re D&O insurance coverage and assignment of rights.	.70	490.00
Sanchez, J.	5/05/21	Research co-defendant issues.	5.30	1,987.50
Rush, M.	5/05/21	Research potential third-party issues.	.90	607.50
Sraders, S.	5/05/21	Draft summary of findings re Debtors' document review and co-defendant analysis.	4.30	2,472.50
Jennings, R.	5/05/21	Research plan issues related to co-defendants.	.30	127.50
Grim, E.	5/06/21	Draft memorandum re plan third-party issues.	1.50	1,050.00
Grim, E.	5/06/21	Review research re plan third-party issues.	.90	630.00

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Name	Date	Services	Hours	Amount
Sraders, S.	5/06/21	Draft summary of Debtors' documents relevant to plan issues.	3.70	2,127.50
Jennings, R.	5/06/21	Research plan issues re co-defendants.	3.90	1,657.50
Gilbert, S.	5/07/21	Confer with M. Kesselman re plan negotiations (0.6); confer with M. Huebner re same (0.4); confer with R. Ringer re same (0.5).	1.50	2,550.00
Gilbert, S.	5/07/21	Confer with AHC co-counsel re plan revisions.	1.50	2,550.00
Gilbert, S.	5/07/21	Confer with AHC and Debtors re plan issues.	1.00	1,700.00
Gilbert, S.	5/07/21	Review and revise plan documents.	1.00	1,700.00
Quinn, K.	5/07/21	Communicate with J. Hudson re insurers' request for call re neutrality and Debtors' proposed language for disclosure statement insert.	.30	330.00
Hudson, J.	5/07/21	Confer with Debtors (S. Massman) re Sacklers' requested treatment of insurance rights.	.30	217.50
Hudson, J.	5/07/21	Analyze Sacklers' requested treatment of insurance rights.	.10	72.50
Hudson, J.	5/07/21	Summarize and redline plan re insurance coverage issues.	1.80	1,305.00
Hudson, J.	5/07/21	Analyze insurance neutrality language issues.	.70	507.50
Hudson, J.	5/07/21	Confer with Debtors re insurance neutrality language in plan documents.	.30	217.50
Hudson, J.	5/07/21	Confer with Debtors (S. Massman) re insurance rights to be transferred to MDT under plan.	.10	72.50
Grim, E.	5/07/21	Revise memorandum re plan third-party issues.	2.70	1,890.00
Wolf, D.	5/07/21	Revise plan documents re insurance coverage.	1.80	1,260.00
Rush, M.	5/07/21	Communications with E. Grim re potential trust claims.	.50	337.50
Johnson, K.	5/07/21	Review and redact analysis of Debtors' documents for production to AHC.	1.70	391.00
Gilbert, S.	5/08/21	Confer with R. Ringer re plan strategy (0.9); confer with AHC re negotiations (1.1).	2.00	3,400.00
Quinn, K.	5/08/21	Correspond with J. Hudson and E. Grim re response to insurance neutrality request from Debtors.	.20	220.00
Hudson, J.	5/08/21	Revise joinder to opposition to insurers' objection re insurance neutrality language in plan.	1.00	725.00
Hudson, J.	5/08/21	Prepare for call with Debtors and insurers re insurance neutrality language in plan documents.	.20	145.00
Litherland, C.	5/09/21	Communicate with J. Hudson re "insurance neutrality" provision in the plan.	.30	420.00
Hudson, J.	5/09/21	Confer with Debtors and insurers re insurance neutrality language in plan documents.	.40	290.00

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Name	Date	Services	Hours	Amount
Hudson, J.	5/09/21	Analyze options for insurance neutrality language in plan documents following discussion with Debtors and insurers.	.20	145.00
Hudson, J.	5/09/21	Revise joinder to opposition to insurers' objection re insurance neutrality language in plan.	.60	435.00
Grim, E.	5/09/21	Confer with insurer counsel and Debtors' counsel re plan issue.	.40	280.00
Gilbert, S.	5/10/21	Confer with AHC and Debtors re plan.	1.50	2,550.00
Gilbert, S.	5/10/21	Confer with DOJ re plan.	.50	850.00
Gilbert, S.	5/10/21	Meet with AHC and Debtors re open plan issues.	1.50	2,550.00
Quinn, K.	5/10/21	Review disclosure statement objection responses.	.80	880.00
Quinn, K.	5/10/21	Review revisions to disclosure statement.	1.20	1,320.00
Quinn, K.	5/10/21	Confer with J. Hudson, C. Litherland, and R. Shore re potential plan revisions.	1.20	1,320.00
Shore, R.	5/10/21	Confer with J. Hudson, C. Litherland, and K. Quinn re potential plan revisions.	1.20	1,620.00
Litherland, C.	5/10/21	Confer with R. Shore, K. Quinn, E. Grim, and J. Hudson re insurance issues related to plan of reorganization.	1.50	2,100.00
Hudson, J.	5/10/21	Analyze various insurance implications of draft plan.	.40	290.00
Hudson, J.	5/10/21	Review policy provisions that may interact with neutrality concept in draft plan.	2.10	1,522.50
Hudson, J.	5/10/21	Analyze potential approaches to neutrality in plan.	.20	145.00
Grim, E.	5/10/21	Confer with insurance and bankruptcy team re plan impact on insurance-related issues.	1.50	1,050.00
Gilbert, S.	5/11/21	Confer with T. Sobol re plan fee provisions.	.50	850.00
Gilbert, S.	5/11/21	Confer with D. Barrett re fees.	.50	850.00
Gilbert, S.	5/11/21	Confer with A. Andrews and S. Higgins re plan issues.	1.00	1,700.00
Gilbert, S.	5/11/21	Meet with AHC, Tribal Leadership Committee, and NCSG re plan fee provisions.	1.00	1,700.00
Gilbert, S.	5/11/21	Confer with AHC co-counsel re fee issues.	1.00	1,700.00
Hudson, J.	5/11/21	Confer with Debtors (S. Massman) re analyzing Sacklers' position on insurance issues.	.20	145.00
Hudson, J.	5/11/21	Confer with Debtors (E. Vonnegut, S. Massman, D. Kratzer, A. Kramer) and Sacklers' counsel (D. Porat and J. Dougherty) re analyzing Sacklers' position on insurance issues.	.90	652.50
Hudson, J.	5/11/21	Confer with Debtors and Sacklers' counsel re addressing Sacklers' position on insurance issues.	.60	435.00
Hudson, J.	5/11/21	Prepare for call with Debtors and Sacklers' counsel re insurance treatment in plan.	.10	72.50

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Name	Date	Services	Hours	Amount
Grim, E.	5/11/21	Confer with Debtors and Sacklers' counsel re plan insurance issues.	.90	630.00
Grim, E.	5/11/21	Confer with public opioid creditor groups (MSGC, NCSG, tribes) re plan treatment of attorney fees.	1.00	700.00
Grim, E.	5/11/21	Confer with non-states re attorney fee issues.	1.80	1,260.00
Grim, E.	5/11/21	Review updated plan language re insurance issues.	.20	140.00
Wolf, D.	5/11/21	Confer with counsel for Sacklers and Debtors re assignment of shareholder insurance rights.	.90	630.00
Gilbert, S.	5/12/21	Attend confirmation procedures hearing.	1.50	2,550.00
Gilbert, S.	5/12/21	Confer with Tribal Leadership Council re plan fee issues.	.50	850.00
Gilbert, S.	5/12/21	Confer with NAS re fees.	.50	850.00
Quinn, K.	5/12/21	Confer with C. Litherland, J. Hudson, R. Shore re plan insurance provisions.	1.00	1,100.00
Shore, R.	5/12/21	Confer with D. Wolf and J. Hudson re assignment of insurance rights.	.80	1,080.00
Litherland, C.	5/12/21	Confer with R. Shore, K. Quinn, J. Hudson, E. Grim, and D. Wolf re plan provisions related to insurance and risks that might be mitigated.	1.60	2,240.00
Hudson, J.	5/12/21	Analyze approach to addressing Sacklers' position on insurance issues.	.90	652.50
Hudson, J.	5/12/21	Prepare for next call with Debtors and Sacklers' counsel re addressing Sacklers' position on insurance issues.	.30	217.50
Hudson, J.	5/12/21	Analyze insurance issues to be addressed in plan.	1.10	797.50
Grim, E.	5/12/21	Attend hearing re confirmation procedures and creditor mediation. (Partial)	.50	350.00
Grim, E.	5/12/21	Review private creditor TDPs.	.40	280.00
Grim, E.	5/12/21	Confer with C. Litherland and K. Quinn re plan litigation strategy.	.80	560.00
Grim, E.	5/12/21	Confer with insurance team re insurance-related plan issues.	.90	630.00
Wolf, D.	5/12/21	Confer with R. Shore and J. Hudson re assignment of insurance rights.	.80	560.00
Sraders, S.	5/12/21	Analyze TDPs for private creditors and compare to term sheets.	2.10	1,207.50
Gilbert, S.	5/13/21	Confer with S. Birnbaum re plan negotiations.	.50	850.00
Gilbert, S.	5/13/21	Confer with T. Sobol re TPP plan provisions.	.50	850.00
Gilbert, S.	5/13/21	Confer with A. Andrews re TDPs.	.50	850.00
Quinn, K.	5/13/21	Participate in call re shareholder insurance contribution.	.50	550.00

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Quinn, K.	5/13/21	Confer with Debtors' counsel (A. Libby) re collateral term sheet issues.	.50	550.00
Hudson, J.	5/13/21	Confer with Debtors (E. Vonnegut, S. Massman, D. Kratzer, A. Kramer) and Sacklers' counsel (D. Porat and J. Dougherty) re analyzing Sacklers' position on insurance issues.	.90	652.50
Hudson, J.	5/13/21	Communicate with co-counsel at Brown Rudnick (G. Cicero, T. Wallach, S. Pohl, and A. Andromalos) re insurance aspects of draft shareholder agreement.	.20	145.00
Hudson, J.	5/13/21	Prepare for next call with Debtors (E. Vonnegut, S. Massman, D. Kratzer, A. Kramer) and Sacklers' counsel (D. Porat and J. Dougherty) re analyzing Sacklers' position on insurance issues.	.10	72.50
Hudson, J.	5/13/21	Confer with Debtors (S. Massman) re addressing Sacklers' position on insurance issues.	.10	72.50
Hudson, J.	5/13/21	Prepare for next call with Debtors and Sacklers' counsel re addressing their position on insurance issues.	.20	145.00
Hudson, J.	5/13/21	Revise non-exclusive list of MDT policies.	.20	145.00
Grim, E.	5/13/21	Confer with Debtors and shareholder counsel re plan insurance issues.	.90	630.00
Grim, E.	5/13/21	Review summary re hearing on confirmation procedures.	.10	70.00
Grim, E.	5/13/21	Review West Virginia objection re hearing on confirmation procedures.	.10	70.00
Grim, E.	5/13/21	Review private creditor TDPs for plan drafting purposes.	.50	350.00
Wolf, D.	5/13/21	Confer with counsel for Sacklers and Debtors re assignment of shareholder insurance rights.	.90	630.00
Wolf, D.	5/13/21	Revise plan documents re D&O insurance coverage and assignment of coverage rights.	.40	280.00
Sraders, S.	5/13/21	Analyze private creditor term sheets and trust distribution procedures to ensure consistency and flag any issues.	2.80	1,610.00
Gilbert, S.	5/14/21	Review materials and revise re plan.	1.00	1,700.00
Gilbert, S.	5/14/21	Confer M. Kesselman and S. Birnbaum re private creditor deals.	1.00	1,700.00
Gilbert, S.	5/14/21	Correspond and confer with AHC mediation subgroup re fee issues and unresolved issues.	2.00	3,400.00
Gilbert, S.	5/14/21	Confer with K. Maclay re fees.	.50	850.00
Litherland, C.	5/14/21	Analyze previous examples of provisions related to insurance neutrality in mass tort plans.	1.30	1,820.00

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Name	Date	Services	Hours	Amount
Hudson, J.	5/14/21	Analyze next steps for insurance neutrality negotiations with insurers.	.10	72.50
Grim, E.	5/14/21	Revise private creditor TDPs.	.50	350.00
Sraders, S.	5/14/21	Confer with AHC and Debtors re outstanding questions re private TDPs.	1.80	1,035.00
Quinn, K.	5/15/21	Participate in call with co-counsel (R. Ringer, others) re disclosure statement hearing plan.	.80	880.00
Grim, E.	5/15/21	Confer with creditor and Debtors' counsel re open issues on Sacklers' agreements and plan supplements.	.70	490.00
Wolf, D.	5/15/21	Confer with counsel for Debtors, AHC, and UCC re disclosure statement and accompanying exhibits.	.70	490.00
Quinn, K.	5/16/21	Confer with plan support group re disclosure statement hearing.	.60	660.00
Shore, R.	5/16/21	Analyze plan issues.	1.00	1,350.00
Hudson, J.	5/16/21	Analyze outstanding issues and potential next steps re insurance for plan and related documentation.	2.80	2,030.00
Grim, E.	5/16/21	Communicate with co-counsel re open issues on private creditor TDPs.	.30	210.00
Grim, E.	5/16/21	Review new proposed insurance language from Debtors' counsel.	.30	210.00
Sraders, S.	5/16/21	Confer with G. Cicero and E. Grim re outstanding issues re private TDPs.	.70	402.50
Gilbert, S.	5/17/21	Confer with M. Kesselman and S. Birnbaum re plan negotiations.	.50	850.00
Quinn, K.	5/17/21	Confer with team re status of disclosure statement hearing.	.40	440.00
Quinn, K.	5/17/21	Confer with S. Gilbert re status of negotiations and insurance implications.	.30	330.00
Quinn, K.	5/17/21	Correspond with J. Hudson re revising language in plan re insurance provisions.	.80	880.00
Hudson, J.	5/17/21	Confer with Debtors (S. Massman) re resolving outstanding insurance-related issues with released parties.	.30	217.50
Hudson, J.	5/17/21	Confer with counsel for released parties (Mintz and Milbank) and Debtors (Davis Polk) re potential resolution of insurance matters in plan.	.40	290.00
Hudson, J.	5/17/21	Revise insurance-related portions of plan and related documentation.	4.40	3,190.00
Hudson, J.	5/17/21	Revise MDT policy listing.	.10	72.50
Wolf, D.	5/17/21	Revise plan documents and draft settlement agreements re insurance coverage issues.	.30	210.00



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Name	Date	Services	Hours	Amount
Wolf, D.	5/17/21	Confer with counsel for Debtors and Sacklers re insurance coverage and assignments.	.40	280.00
Wolf, D.	5/17/21	Revise plan documents re insurance coverage and assignment of insurance rights.	.60	420.00
Gilbert, S.	5/18/21	Correspond with AHC re plan and disclosure statement (1.2); confer with Debtors' counsel re same (1.2).	2.50	4,250.00
Gilbert, S.	5/18/21	Correspond with co-counsel re plan (1.2); confer with Debtors' counsel (E. Vonnegut) re same (0.8).	2.00	3,400.00
Gilbert, S.	5/18/21	Confer with G. Uzzi re plan.	.50	850.00
Gilbert, S.	5/18/21	Confer with non states re plan provision on fee issues.	1.00	1,700.00
Quinn, K.	5/18/21	Review and revise draft language re insurance entity injunction.	.60	660.00
Quinn, K.	5/18/21	Communicate with team re valuation language and "exposure" change.	.50	550.00
Quinn, K.	5/18/21	Confer with K. Maclay re open plan items.	.20	220.00
Shore, R.	5/18/21	Review and revise language re quantum of liability.	.50	675.00
Litherland, C.	5/18/21	Communicate with S. Gilbert, J. Hudson, K. Quinn, and others re confirmation findings related to liabilities.	.50	700.00
Hudson, J.	5/18/21	Confer with Debtors (A. Kramer) re MDT policy listing.	.30	217.50
Hudson, J.	5/18/21	Review current draft of MDT policy listing.	.10	72.50
Hudson, J.	5/18/21	Revise insert for plan re estimated liability.	.80	580.00
Hudson, J.	5/18/21	Revise insurance-related provisions in amended plan.	1.80	1,305.00
Hudson, J.	5/18/21	Confer with Debtors (S. Massman) re outstanding insurance-related issues.	.60	435.00
Grim, E.	5/18/21	Analyze Debtors' new insurance-related edits to plan.	1.30	910.00
Wolf, D.	5/18/21	Revise plan documents and settlement agreements re insurance coverage rights.	.50	350.00
Gilbert, S.	5/19/21	Confer with NAS re plan negotiations.	.50	850.00
Gilbert, S.	5/19/21	Confer with T. Sobol re TPP payment stream.	.50	850.00
Gilbert, S.	5/19/21	Confer with AHC co-counsel re plan revisions.	1.50	2,550.00
Quinn, K.	5/19/21	Review and revise comments to valuation provision.	.40	440.00
Shore, R.	5/19/21	Review and revise plan and disclosure statement language.	1.00	1,350.00
Litherland, C.	5/19/21	Communicate with S. Gilbert re confirmation findings.	.40	560.00

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Name	Date	Services	Hours	Amount
Hudson, J.	5/19/21	Revise insurance injunctions in amended plan.	.30	217.50
Hudson, J.	5/19/21	Revise insert for plan re estimated liability.	.50	362.50
Hudson, J.	5/19/21	Review Debtors' revisions to MDT policy listing.	.10	72.50
Hudson, J.	5/19/21	Revise general insurance-related provisions of plan.	.40	290.00
Hudson, J.	5/19/21	Outline remaining insurance-related items in plan.	.40	290.00
Wolf, D.	5/19/21	Revise plan documents and settlement agreements re insurance coverage rights.	1.20	840.00
Sanchez, J.	5/19/21	Draft correspondence re insolvent insurer process for filing proof of claims.	.30	112.50
Gilbert, S.	5/20/21	Confer with G Uzzi re plan.	.50	850.00
Gilbert, S.	5/20/21	Attend Court status conference.	1.00	1,700.00
Gilbert, S.	5/20/21	Correspond and confer with non-state representatives re fee issues and plan.	2.00	3,400.00
Gilbert, S.	5/20/21	Confer with A. Troop re Sackler negotiations.	.50	850.00
Gilbert, S.	5/20/21	Confer with K. Eckstein re open plan issues.	1.00	1,700.00
Gilbert, S.	5/20/21	Review and revise plan re fees.	1.00	1,700.00
Quinn, K.	5/20/21	Confer with Sackler representatives re proposed disclosure statement concerns.	.80	880.00
Quinn, K.	5/20/21	Follow up call with R. Shore re Sackler discussion (0.6); communicate with J. Hudson re same (0.3).	.90	990.00
Quinn, K.	5/20/21	Participate in hearing re disclosure statement status, insurance adversary proceeding, etc.	1.80	1,980.00
Quinn, K.	5/20/21	Revise draft language re insurance finding reservation.	.20	220.00
Shore, R.	5/20/21	Analyze plan / disclosure statement issues (0.4); confer with team re same (0.7); revise draft language re same (0.9).	2.00	2,700.00
Litherland, C.	5/20/21	Confer with P. Joseph (shareholder counsel), J. Hudson, S. Gilbert, R. Shore and others re confirmation findings.	.60	840.00
Litherland, C.	5/20/21	Confer with R. Shore, J. Hudson, and others re confirmation findings and other insurance-related issues.	.20	280.00
Litherland, C.	5/20/21	Communicate with R. Shore, J. Hudson, and others re confirmation findings issues.	.20	280.00
Hudson, J.	5/20/21	Confer with shareholder counsel (D. Joseph and A. Lees) re potential approach to insurance-related issues in plan.	.80	580.00
Hudson, J.	5/20/21	Attend hearing re insurance-related items in plan negotiations and hearing on motion to seal filed in insurance adversary proceeding.	1.80	1,305.00

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Name	Date	Services	Hours	Amount
Hudson, J.	5/20/21	Follow-up call with shareholder counsel (D. Joseph and A. Lees) re potential approach to insurance-related issues in plan.	1.00	725.00
Hudson, J.	5/20/21	Redline plan documents and list of outstanding insurance issues for discussion with Debtors.	1.60	1,160.00
Quinn, K.	5/21/21	Confer with C. Litherland, J. Hudson, D. Wolf, E. Grim re open items for disclosure statement.	1.40	1,540.00
Quinn, K.	5/21/21	Communicate with team re PI consent issues in plan.	.60	660.00
Litherland, C.	5/21/21	Communicate with J. Hudson re negotiation of plan provisions related to insurance recovery.	.20	280.00
Litherland, C.	5/21/21	Confer with R. Shore, J. Hudson, K. Quinn, and others re insurance provisions in plan and disclosure statement.	1.00	1,400.00
Hudson, J.	5/21/21	Continue redlining plan documents and list of outstanding insurance issues for discussion with Debtors.	1.90	1,377.50
Hudson, J.	5/21/21	Revise insurance-related provisions of plan.	1.50	1,087.50
Grim, E.	5/21/21	Review newest iteration of plan for insurance-related implications.	.80	560.00
Grim, E.	5/21/21	Confer with team re newest insurance revisions to plan.	1.50	1,050.00
Grim, E.	5/21/21	Review draft stipulation re Canadian claims.	.20	140.00
Wolf, D.	5/21/21	Revise plan documents and settlement agreements re insurance coverage issues.	.50	350.00
Wolf, D.	5/21/21	Confer with C. Litherland, R. Shore, K. Quinn, J. Hudson, and E. Grim re revisions to plan documents.	1.40	980.00
Quinn, K.	5/22/21	Communicate with team re language re insurer injunction issues.	.20	220.00
Litherland, C.	5/22/21	Communicate with S. Gilbert and J. Hudson re other examples of insurance back-up provisions.	.60	840.00
Litherland, C.	5/22/21	Communication with S Gilbert and others re examples of plan insurance focused back-up claims determinations.	.80	1,120.00
Hudson, J.	5/22/21	Confer with Debtors (S. Birnbaum and M. Kesselman) re insurance-related injunction provisions of plan.	.20	145.00
Hudson, J.	5/22/21	Revise insurance-related provisions of plan.	.90	652.50
Gilbert, S.	5/23/21	Review materials for plan meetings and disclosure statement hearing while traveling to New York, NY.	4.50	7,650.00
Gilbert, S.	5/23/21	Meet with S. Burian re plan financial issues.	1.00	1,700.00
Quinn, K.	5/23/21	Confer with team re plan provisions.	.50	550.00

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Litherland, C.	5/23/21	Confer with S. Gilbert re plan provision permitting pursuit of claims to reach unsettled insurance and balancing various interests in that context.	.40	560.00
Litherland, C.	5/23/21	Communicate with S. Gilbert, R. Shore, J. Hudson and others re plan provisions related to pursuit of unreached insurance.	.50	700.00
Litherland, C.	5/23/21	Communicate with J. Hudson, R. Shore and others re balancing creditor interests with possible pursuit of claims to tap unsettled insurance.	.60	840.00
Litherland, C.	5/23/21	Revise summary of open plan issues.	.30	420.00
Hudson, J.	5/23/21	Confer with Debtors (S. Massman) re insurance-related revisions to plan.	.20	145.00
Hudson, J.	5/23/21	Revise insurance-related revisions to plan.	.40	290.00
Grim, E.	5/23/21	Review Debtors' insurance-related plan edits (0.6); communicate with team re same (0.3).	.90	630.00
Gilbert, S.	5/24/21	Confer with insurance team re plan insurance issues.	.70	1,190.00
Gilbert, S.	5/24/21	Confer with AHC counsel re plan.	1.10	1,870.00
Gilbert, S.	5/24/21	Confer with Debtors and AHC re insurance-related plan issues.	1.20	2,040.00
Gilbert, S.	5/24/21	Confer with co-counsel (G. Cicero) and E. Grim re fee issues.	1.50	2,550.00
Gilbert, S.	5/24/21	Confer with AHC re open plan.	2.00	3,400.00
Gilbert, S.	5/24/21	Confer with MSGE re fees.	.50	850.00
Gilbert, S.	5/24/21	Meet with A. Andrews re PI plan issues.	2.00	3,400.00
Quinn, K.	5/24/21	Confer with team re insurance issues in plan.	.70	770.00
Quinn, K.	5/24/21	Confer with Debtors, AHC and team re open plan issues.	1.20	1,320.00
Quinn, K.	5/24/21	Confer with team re sub trust consent point in plan.	.30	330.00
Shore, R.	5/24/21	Review and analyze plan and disclosure statement provisions dealing with insurance (3.3); confer with team re same (0.5); confer with Debtors' counsel re same (1.2 ).	5.00	6,750.00
Litherland, C.	5/24/21	Confer with Debtors' representatives, S. Gilbert, R. Shore, J. Hudson, and others re open disclosure statement / plan issues.	.70	980.00
Litherland, C.	5/24/21	Communicate with J. Hudson, R. Shore, and others re impact on claimant agreements as to shared value resulting from back-up provisions.	.50	700.00
Litherland, C.	5/24/21	Confer with J. Hudson, R. Shore and others re insurance back-up provisions, findings and other open issues.	.90	1,260.00

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Name	Date	Services	Hours	Amount
Litherland, C.	5/24/21	Revise summary of open insurance related plan provisions.	.30	420.00
Litherland, C.	5/24/21	Communicate with S. Gilbert and others re timing of commitment on final confirmation issues.	.60	840.00
Litherland, C.	5/24/21	Communicate with S. Gilbert, J. Hudson, and others re implementation of released party consent to settlement of insurance rights.	.30	420.00
Litherland, C.	5/24/21	Revise language for released party deemed consent.	.60	840.00
Litherland, C.	5/24/21	Communicate with J. Hudson, K. Quinn, and others re co-defendant claims.	.80	1,120.00
Hudson, J.	5/24/21	Confer with Debtors (M. Kesselman, S. Birnbaum, E. Vonnegut, S. Massman), AHC (J. Guard), and bankruptcy team (S. Gilbert, K. Quinn, E. Grim) re insurance-related provisions of plan.	1.20	870.00
Hudson, J.	5/24/21	Draft outline for Debtors' insurance-related bases for opposition to co-defendant objection.	.90	652.50
Hudson, J.	5/24/21	Revise insurance-related provisions of plan.	4.80	3,480.00
Grim, E.	5/24/21	Review multiple rounds of Debtors' edits to plan.	2.10	1,470.00
Grim, E.	5/24/21	Communicate with Debtors re plan insurance edits (0.7); communicate with team re same (0.9).	1.60	1,120.00
Grim, E.	5/24/21	Confer with co-counsel (S. Pohl, G. Cicero) and S. Gilbert re fee fund issue.	1.50	1,050.00
Grim, E.	5/24/21	Confer with team re third-party insurance rights (0.3); confer with Debtors' counsel (E. Vonnegut) re same (0.2)	.50	350.00
Wolf, D.	5/24/21	Confer with S. Gilbert, R. Shore, K. Quinn, J. Hudson, and E. Grim re plan documents re insurance coverage.	.70	490.00
Wolf, D.	5/24/21	Revise plan documents re insurance coverage matters.	4.40	3,080.00
Wolf, D.	5/24/21	Confer with E. Vonnegut, S. Birnbaum, S. Gilbert, R. Shore, J. Hudson and E. Grim re plan provisions re insurance coverage.	.70	490.00
Sraders, S.	5/24/21	Confer with Brown Rudnick (D. Molton, S. Pohl, G. Cicero and S. Gilbert and E. Grim (Gilbert LLP) re treatment of attorney fees.	.50	287.50
Gilbert, S.	5/25/21	Telephone conferences with M. Kesselman, K. Eckstein, A. Andrews and S. Higgins re PI deal points (4.9); revise plan language re same (2.6).	7.50	12,750.00
Gilbert, S.	5/25/21	Confer with Davis Polk re disclosure statement issues.	.50	850.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	5/25/21	Confer with Davis Polk, Akin, and others re disclosure hearing and plan issues (2.8); communications with AHC re same (1.7).	4.50	7,650.00
Quinn, K.	5/25/21	Review plan materials (1.9); correspond with team re Davis Polk proposed revisions to plan language (0.6).	2.50	2,750.00
Quinn, K.	5/25/21	Review updates re disclosure statement hearing status.	.20	220.00
Litherland, C.	5/25/21	Communicate with J. Hudson, R. Shore and others re disclosure statement provisions related to insurance rights.	1.30	1,820.00
Hudson, J.	5/25/21	Redline plan and disclosure statement re insurance issues.	4.80	3,480.00
Hudson, J.	5/25/21	Prepare for disclosure statement hearing.	.10	72.50
Grim, E.	5/25/21	Revise plan.	.40	280.00
Grim, E.	5/25/21	Communicate with Debtors re revisions to plan.	.30	210.00
Wolf, D.	5/25/21	Revise disclosure statement documents re insurance coverage matters.	1.50	1,050.00
Sraders, S.	5/25/21	Review edits to the plan re attorneys fees.	1.00	575.00
Sraders, S.	5/25/21	Research re history of insurance neutrality provisions in plan.	2.20	1,265.00
Gilbert, S.	5/26/21	Confer with Davis Polk re plan and disclosure statement hearing.	2.00	3,400.00
Gilbert, S.	5/26/21	Correspond with AHC re plan revisions and hearing (1.8); confer with Debtors re same (1.2).	3.00	5,100.00
Gilbert, S.	5/26/21	Attend disclosure statement hearing.	7.00	11,900.00
Quinn, K.	5/26/21	Confer with J. Hudson re plan edits.	.20	220.00
Quinn, K.	5/26/21	Participate in call with team re insurance finding in plan.	.40	440.00
Shore, R.	5/26/21	Attend disclosure statement hearing (partial).	6.00	8,100.00
Shore, R.	5/26/21	Analyze plan and disclosure statement issues related to insurance (2.6); confer with team re same (0.4).	3.00	4,050.00
Litherland, C.	5/26/21	Confer with R. Shore, J. Hudson and others re confirmation findings.	.40	560.00
Litherland, C.	5/26/21	Communicate with J. Hudson, S. Gilbert, R. Shore and others re confirmation findings and related negotiations.	.70	980.00
Hudson, J.	5/26/21	Revise insurance-related provisions in third amended plan.	2.20	1,595.00
Hudson, J.	5/26/21	Review fourth amended plan for insurance-related clauses prior to disclosure statement hearing.	.90	652.50

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Name	Date	Services	Hours	Amount
Hudson, J.	5/26/21	Analyze next steps for resolution of assignment of shareholder insurance rights.	.20	145.00
Hudson, J.	5/26/21	Attend disclosure statement hearing.	6.80	4,930.00
Grim, E.	5/26/21	Review updated insurance amendments to plan.	.30	210.00
Grim, E.	5/26/21	Attend disclosure statement hearing (partial).	1.20	840.00
Wolf, D.	5/26/21	Confer with C. Litherland, R. Shore, and J. Hudson re disclosure statement revisions and hearing.	.40	280.00
Wolf, D.	5/26/21	Revise disclosure statement documents re insurance coverage matters.	.80	560.00
Gilbert, S.	5/27/21	Confer with K. Eckstein re plan.	.50	850.00
Gilbert, S.	5/27/21	Confer with Davis Polk re plan issues.	1.00	1,700.00
Litherland, C.	5/27/21	Confer with K. Eckstein and S. Gilbert re channeling of claims against Sacklers.	.70	980.00
Hudson, J.	5/27/21	Analyze potential resolution of outstanding insurance issues with Sacklers.	.10	72.50
Hudson, J.	5/27/21	Analyze insurance-related aspects of plan.	.10	72.50
Shore, R.	5/28/21	Confer with team re securing liability finding in confirmation order, experts and coordination with Debtors.	1.50	2,025.00
Litherland, C.	5/28/21	Confer with R. Shore, K. Quinn, J. Hudson, E. Grim and D. Wolf re experts to support confirmation findings.	1.50	2,100.00
Hudson, J.	5/28/21	Confer with C. Litherland, R. Shore, K. Quinn, E. Grim, and D. Wolf re valuation at confirmation issues.	1.50	1,087.50
Hudson, J.	5/28/21	Redline section 8.8 of draft plan and disclosure statement.	.20	145.00
Hudson, J.	5/28/21	Redline insurance-related definitions in plan and disclosure statement.	1.10	797.50
Grim, E.	5/28/21	Confer with team re liability valuation provisions in plan.	1.50	1,050.00
Wolf, D.	5/28/21	Confer with C. Litherland, R. Shore, K. Quinn, J. Hudson, and E. Grim re confirmation hearing preparations.	1.50	1,050.00
Rush, M.	5/28/21	Communicate with team re claims valuation.	.40	270.00
Sraders, S.	5/28/21	Confer with R. Jennings re insurance neutrality research.	.30	172.50
Shore, R.	5/29/21	Review correspondence re plan issues.	.30	405.00
Hudson, J.	5/29/21	Redline section 8.8 of draft plan and disclosure statement.	.80	580.00
Gilbert, S.	5/30/21	Confer with Davis Polk re plan issues.	1.50	2,550.00

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Name	Date	Services	Hours	Amount
Shore, R.	5/30/21	Confer with co-counsel re securing liability finding in confirmation order.	1.00	1,350.00
Hudson, J.	5/30/21	Confer with Brown Rudnick and Kramer Levin re potential approaches to valuation at confirmation.	.60	435.00
Hudson, J.	5/30/21	Redline insurance provisions of draft plan and disclosure statement.	1.30	942.50
Grim, E.	5/30/21	Draft analysis of claim valuation issues for confirmation proceedings.	.70	490.00
Grim, E.	5/30/21	Confer with co-counsel (D. Molton, R. Ringer, others) re claim valuation issues for confirmation (partial).	.50	350.00
Wolf, D.	5/30/21	Confer with D. Molton, G. Cicero, R. Ringer, R. Shore, E. Grim, and J. Hudson re confirmation order findings.	1.00	700.00
Gilbert, S.	5/31/21	Correspond with AHC mediation subgroup re fees (1.1); revisions to plan re fees (1.9).	3.00	5,100.00
Gilbert, S.	5/31/21	Confer with K. Eckstein re plan issues.	1.00	1,700.00
Gilbert, S.	5/31/21	Correspond with non-state representatives re fee issues (0.3); revise plan re fee issues (0.7).	1.00	1,700.00
Gilbert, S.	5/31/21	Confer with Pls re creditors deal terms in plan.	.50	850.00
Gilbert, S.	5/31/21	Correspond with S. Birnbaum and AHC re plan.	1.00	1,700.00
Gilbert, S.	5/31/21	Confer with Davis Polk re plan issues.	2.50	4,250.00
Litherland, C.	5/31/21	Communicate with R. Shore, J. Hudson, and others re rights to control settlement of underlying claims related to collateral held by insurers.	.90	1,260.00
Hudson, J.	5/31/21	Redline insurance provisions of draft plan and disclosure statement.	1.10	797.50
Grim, E.	5/31/21	Review Debtors' new edits to plan insurance provisions.	.10	70.00
<b>Project Total:</b>			<b>349.90</b>	<b>\$ 368,071.00</b>

#### A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Quinn, K.	5/01/21	Revise draft brief re motion to dismiss.	2.50	2,750.00
Litherland, C.	5/01/21	Revise and comment on brief re arbitration of insurance disputes.	.60	840.00
Hudson, J.	5/01/21	Review opposition to TIG arbitration motion.	.10	72.50
Hudson, J.	5/01/21	Revise arbitration opposition.	1.10	797.50
Hudson, J.	5/01/21	Revise more definite statement opposition.	.20	145.00
Hudson, J.	5/01/21	Prepare to file oppositions to insurer opening briefs.	.10	72.50



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Name	Date	Services	Hours	Amount
Glaebberman, M.	5/01/21	Review documents in connection with personal jurisdiction motion to dismiss.	5.50	1,650.00
Jones, T.	5/01/21	Review Debtors' documents in connection with motion to dismiss opposition.	2.00	600.00
Rush, M.	5/01/21	Review supporting materials for opposition to personal jurisdiction motions to dismiss.	.60	405.00
Rush, M.	5/01/21	Revise opposition to personal jurisdiction motions to dismiss.	1.00	675.00
Johnson, K.	5/01/21	Cite check and fact check memorandum of law in opposition to personal jurisdiction.	3.60	828.00
Gaske, A.	5/01/21	Review comments from R. Leveridge and J. Rubinstein re contacts chart in support of personal jurisdiction opposition.	.70	402.50
Gaske, A.	5/01/21	Revise chart in support of personal jurisdiction opposition re insurer communications.	3.70	2,127.50
Leveridge, R.	5/01/21	Revise briefs and supporting material (5.2); communications with Debtors and UCC counsel re opposition briefs (0.5).	5.70	7,980.00
Sraders, S.	5/01/21	Revise draft chart showing insurer litigation in the United States.	4.00	2,300.00
Sraders, S.	5/01/21	Revise draft motion to seal and accompanying proposed order.	.30	172.50
Colcock, S.	5/01/21	Continue cite checking opposition to motions for more definite statement (6.1); begin cite checking opposition to motion for personal jurisdiction (0.4).	6.50	2,145.00
Kaminsky, E.	5/01/21	Revise opposition to motion for more definite statement.	1.40	700.00
Quinn, K.	5/02/21	Correspond with team re edits to briefing.	.30	330.00
Shore, R.	5/02/21	Review and revise briefs (8.3); confer with team re same (0.7).	9.00	12,150.00
Hudson, J.	5/02/21	Revise arbitration opposition.	1.00	725.00
Hudson, J.	5/02/21	Prepare to file oppositions to insurer opening briefs.	.60	435.00
Hudson, J.	5/02/21	Revise opposition to motion to withdraw the reference.	.10	72.50
Hudson, J.	5/02/21	Revise opposition to motion for more definite statement.	.40	290.00
Hudson, J.	5/02/21	Revise opposition to motion re personal jurisdiction.	.30	217.50
Rubinstein, J.	5/02/21	Revise personal jurisdiction opposition brief and associated documents.	3.30	2,640.00
Rubinstein, J.	5/02/21	Continue revising personal jurisdiction opposition papers and associated documents.	3.70	2,960.00

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Name	Date	Services	Hours	Amount
Jones, T.	5/02/21	Review Debtors' documents in connection with motion to dismiss opposition.	2.10	630.00
Rush, M.	5/02/21	Revise opposition to personal jurisdiction motions to dismiss.	6.30	4,252.50
Johnson, K.	5/02/21	Cite check motion to seal, chart for summary judgment motion, litigation chart, and memorandum of law in opposition to personal jurisdiction MTD (5.6); organize exhibits to Gaske declaration (1.2).	6.80	1,564.00
Gaske, A.	5/02/21	Revise chart in support of personal jurisdiction opposition.	2.10	1,207.50
Gaske, A.	5/02/21	Revise chart accompanying personal jurisdiction opposition pursuant to R. Leveridge and J. Rubinstein comments.	1.40	805.00
Gaske, A.	5/02/21	Revise Gaske declaration and charts.	1.50	862.50
Gaske, A.	5/02/21	Review tagged documents re personal jurisdiction opposition.	2.40	1,380.00
Gaske, A.	5/02/21	Analyze exhibits in support of personal jurisdiction opposition.	1.80	1,035.00
Leveridge, R.	5/02/21	Review and revise opposition briefs on motion to dismiss, motion stay in favor of arbitration, objection to motion to withdraw the reference, and supporting material (5.9); communications from Debtors' counsel re same (0.8).	6.70	9,380.00
Sraders, S.	5/02/21	Revise draft chart showing insurer litigation in the United States.	1.30	747.50
Sraders, S.	5/02/21	Revise draft motion to seal and accompanying proposed order.	1.40	805.00
Sraders, S.	5/02/21	Revise draft opposition to motion to dismiss to incorporate new citations.	.40	230.00
Sraders, S.	5/02/21	Analyze insurer responses to determine which redactions to make.	1.10	632.50
Colcock, S.	5/02/21	Continue cite checking opposition to motions for more definite statement and opposition to motion for personal jurisdiction.	4.90	1,617.00
Quinn, K.	5/03/21	Further revisions to opposition to motion to stay adversary proceeding.	1.10	1,210.00
Shore, R.	5/03/21	Review current drafts of opposition briefs.	3.00	4,050.00
Hudson, J.	5/03/21	Incorporate edits from non-consenting states group into adversary oppositions.	.30	217.50
Hudson, J.	5/03/21	Finalize opposition briefs for filing.	5.80	4,205.00
Glaebberman, M.	5/03/21	Continue reviewing documents in connection with personal jurisdiction motion to dismiss.	7.70	2,310.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	5/03/21	Review and revise opposition papers to multiple motions to dismiss, withdraw the reference, or stay litigation in favor of arbitration.	11.70	9,360.00
Jones, T.	5/03/21	Continue review of Debtors' documents in connection with motion to dismiss opposition.	7.00	2,100.00
Rush, M.	5/03/21	Revise opposition to personal jurisdiction motions to dismiss and supporting materials.	9.90	6,682.50
Johnson, K.	5/03/21	Finalize and file consolidated opposition to motions for more definite statement, memorandum of law in opposition to personal jurisdiction motions to dismiss, motion to seal, and accompanying Gaske, Kramer and Rubinstein declarations.	11.80	2,714.00
Gaske, A.	5/03/21	Revise Gaske declaration in support of personal jurisdiction opposition.	1.60	920.00
Gaske, A.	5/03/21	Review J. Rubinstein declaration.	.60	345.00
Gaske, A.	5/03/21	Revise footnotes on chart in support of personal jurisdiction opposition.	4.10	2,357.50
Leveridge, R.	5/03/21	Review edits from clients and co-counsel re opposition to motion to dismiss / personal jurisdiction (5.4); communicate with Debtors' counsel re same (0.3); revise communications to Court and opposing counsel (0.4); review and revise exhibits in support of opposition (0.8).	6.90	9,660.00
Leveridge, R.	5/03/21	Review comments from Debtors, AHC, and common interest committees re opposition to motion for more definite statement.	.80	1,120.00
Leveridge, R.	5/03/21	Communications with Debtors' counsel re briefing and issues relating to filings.	.40	560.00
Leveridge, R.	5/03/21	Review motion to file under seal and related documents (1.2); communications with team re filing motion under seal and communications with court re unredacted material in support of opposition to personal jurisdiction MTD (0.7).	1.90	2,660.00
Ogrey, S.	5/03/21	Revise exhibit to motion for more definite statement chart.	.70	161.00
Sraders, S.	5/03/21	Finalize opposition to motion to dismiss, motion to seal, and associated documents.	5.70	3,277.50
Colcock, S.	5/03/21	Complete cite checking final versions of opposition to motions for more definite statement and opposition to motion for personal jurisdictions.	12.60	4,158.00
Hudson, J.	5/04/21	Review certificates of service for filings.	.20	145.00
Hudson, J.	5/04/21	Confer with Debtors (P. Breene and A. Kramer) re outstanding items in response to complaint.	.60	435.00

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Name	Date	Services	Hours	Amount
Hudson, J.	5/04/21	Communicate with team re submission of unredacted materials in support of motion to seal to Court.	.30	217.50
Rubinstein, J.	5/04/21	Analyze next steps required with motion to dismiss related filings to provide paper copies to court (0.5); analyze next steps in litigation, including discovery (2.1); review motion to substitute (0.3).	2.90	2,320.00
Rush, M.	5/04/21	Communicate with team re providing copies to Court of recent filings.	.20	135.00
Rush, M.	5/04/21	Draft letter to Judge Drain re motion to seal and unredacted documents.	.50	337.50
Rush, M.	5/04/21	Confer with R. Leveridge and J. Rubinstein re case status and strategy.	.60	405.00
Rush, M.	5/04/21	Confer with Reed Smith re next steps in adversary proceeding.	.60	405.00
Johnson, K.	5/04/21	Draft and finalize certificate of service re 5/3 filed documents (0.3); review and organize materials filed 5/3 to send to Judge Drain (5.9).	6.20	1,426.00
Leveridge, R.	5/04/21	Review communication from Court re motion to file under seal and providing Court with unredacted material	1.40	1,960.00
Leveridge, R.	5/04/21	Communications with team re strategy for next steps in litigation including discovery (0.8); communications with Debtors' counsel re same (0.2); review material re discovery discussions with insurer counsel (0.8).	1.80	2,520.00
Leveridge, R.	5/04/21	Review edits from insurer counsel to proposed stipulation of XL Switzerland for Tenecom (0.5); communicate with Debtors' counsel re same (0.3); revise stipulation (1.1).	1.90	2,660.00
Ogrey, S.	5/04/21	Organize filings to be provided to Court.	1.50	345.00
Hudson, J.	5/05/21	Communicate with team re submission of courtesy copies of May 3 filings.	.40	290.00
Hudson, J.	5/05/21	Draft outline of process for finalizing pre-meeting settlement analysis.	.10	72.50
Rubinstein, J.	5/05/21	Revise draft response letter to non-motion to dismiss/stay insurers re discovery (1.1); draft first set of requests for production to insurers (1.6).	2.70	2,160.00
Rush, M.	5/05/21	Review transcript re discovery issues.	.70	472.50
Rush, M.	5/05/21	Review draft response to insurers re discovery.	.50	337.50
Rush, M.	5/05/21	Review draft discovery requests to insurers.	.80	540.00
Johnson, K.	5/05/21	Communicate with insurer counsel listserv re courtesy copies of 5/3 filing (0.8); research local rules re service (1.5).	2.30	529.00

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Name	Date	Services	Hours	Amount
Johnson, K.	5/05/21	Review and organize courtesy copies for Reed Smith of 5/3 filing (0.6); review and organize co-defendant contracts and related materials (0.6); confer with S. Colcock re adversary proceeding materials (0.6); confer with A. Gaske re Document O project (0.3).	2.10	483.00
Gaske, A.	5/05/21	Confer with K. Johnson re Document O project.	.30	172.50
Leveridge, R.	5/05/21	Review potential offensive discovery requests.	.50	700.00
Leveridge, R.	5/05/21	Review correspondence re defensive discovery from non-moving insurers (1.2); review proposed response and comment on same (0.8); communications with Debtors' counsel re same (0.6).	2.60	3,640.00
Colcock, S.	5/05/21	Confer with K. Johnson re courtesy copy service on insurers and other adversary proceeding issues.	.60	198.00
Shore, R.	5/06/21	Confer with R. Leveridge, S. Sraders, J. Rubinstein, M. Rush, A. Gaske, K. Johnson, and S. Colcock re next steps in case and discovery.	.80	1,080.00
Hudson, J.	5/06/21	Prepare for settlement discussions with insurers.	.90	652.50
Rubinstein, J.	5/06/21	Revise first set of discovery requests to insurers (0.5); confer with team re insurance adversary proceeding strategy (0.8).	1.30	1,040.00
Rush, M.	5/06/21	Confer with team re litigation strategy and next steps.	.80	540.00
Johnson, K.	5/06/21	Confer with M. Rush, J. Rubinstein, S. Colcock, A. Gaske, S. Sraders, R. Shore and R. Leveridge re status and strategy.	.80	184.00
Gaske, A.	5/06/21	Review status of various projects.	.30	172.50
Gaske, A.	5/06/21	Revise Document O for Insurers #21, #29, and #30.	.50	287.50
Gaske, A.	5/06/21	Confer with E. Kaminsky and S. Ogrey re Document O.	.40	230.00
Gaske, A.	5/06/21	Confer with team re litigation strategy.	.80	460.00
Gaske, A.	5/06/21	Review Document O and relevant documents.	1.60	920.00
Leveridge, R.	5/06/21	Confer with team re litigation and discovery issues.	.80	1,120.00
Ogrey, S.	5/06/21	Confer with A. Gaske and E. Kaminsky re Document O.	.40	92.00
Ogrey, S.	5/06/21	Draft Document O for Insurers #23, #29, and #30.	1.10	253.00
Ogrey, S.	5/06/21	Draft Document O for Insurer #9.	.30	69.00
Ogrey, S.	5/06/21	Draft Document O for Insurers #7 and #8.	.80	184.00
Sraders, S.	5/06/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, M. Rush, A. Gaske, K. Johnson, and S. Colcock re next steps in litigation and discovery.	.80	460.00

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Colcock, S.	5/06/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, M. Rush, A. Gaske, S. Sraders and K. Johnson re case strategy and updates.	.80	264.00
Kaminsky, E.	5/06/21	Review Document O.	1.00	500.00
Kaminsky, E.	5/06/21	Confer with A. Gaske and S. Ogrey re Document O project.	.40	200.00
Kaminsky, E.	5/06/21	Draft Document O re Insurer #29.	1.40	700.00
Shore, R.	5/07/21	Analyze insurance recovery strategy.	.70	945.00
Shore, R.	5/07/21	Revise draft letter to insurers.	.90	1,215.00
Hudson, J.	5/07/21	Analyze potential motions practice and approach to likely defenses.	.70	507.50
Hudson, J.	5/07/21	Revise bankruptcy case update and settlement invitation letter to insurers.	.90	652.50
Rubinstein, J.	5/07/21	Review Kentucky decision re because of bodily injury issue (0.3); revise requests for production to insurers (1.4); analyze strategy re litigation adversary proceeding and insurance recovery (0.6).	2.30	1,840.00
Wolf, D.	5/07/21	Communicate with team re insurance litigation strategy.	.60	420.00
Rush, M.	5/07/21	Analyze adversary proceeding strategy and next steps.	.60	405.00
Johnson, K.	5/07/21	Review status of pending projects (1.0); draft list of same (1.3).	2.30	529.00
Gaske, A.	5/07/21	Revise additional portions of insurer-specific reference sheet for Insurers #21, #29, and #30.	1.30	747.50
Leveridge, R.	5/07/21	Review insurance adversary proceeding status and strategy.	.50	700.00
Ogrey, S.	5/07/21	Revise notes re Document O for Insurers #7, #8, #9, #23, #29, and #30.	1.50	345.00
Ogrey, S.	5/07/21	Draft Document O for Insurers #5 and #36.	.80	184.00
Ogrey, S.	5/07/21	Draft Document O for Insurer #25.	.40	92.00
Ogrey, S.	5/07/21	Draft Document O for Insurers #16 and #17.	.40	92.00
Ogrey, S.	5/07/21	Draft Document O for Insurer #13.	.50	115.00
Ogrey, S.	5/07/21	Begin drafting Document O for Insurers #31, #33, #34, and #35.	1.30	299.00
Colcock, S.	5/07/21	Communicate with K. Johnson re to-do list.	.40	132.00
Kaminsky, E.	5/07/21	Draft Document O re Insurer #29 (1.0); draft Document O re Insurer #9 (2.0).	3.00	1,500.00
Kaminsky, E.	5/07/21	Draft Document O re Insurer #9.	2.00	1,000.00
Kaminsky, E.	5/07/21	Analyze adversary proceeding strategy.	.60	300.00
Leveridge, R.	5/09/21	Review and revise document requests.	1.20	1,680.00

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Name	Date	Services	Hours	Amount
Shore, R.	5/10/21	Confer with team re document production.	.50	675.00
Hudson, J.	5/10/21	Analyze strategy re potential motions practice.	.30	217.50
Hudson, J.	5/10/21	Review first set of document requests to insurers.	.30	217.50
Hudson, J.	5/10/21	Analyze next steps for settlement.	.10	72.50
Rubinstein, J.	5/10/21	Revise correspondence to co-plaintiff counsel re next steps strategy (0.4); review blacklines of amended disclosure statement and plan as relates to adversary proceeding (1.3); revise draft requests for production to insurers (0.9); analysis re claim notice (0.4).	3.00	2,400.00
Rubinstein, J.	5/10/21	Confer with litigation team re discovery and document production issues.	.50	400.00
Rush, M.	5/10/21	Confer with J. Rubinstein, R. Shore, and R. Leveridge re case strategy.	.50	337.50
Gaske, A.	5/10/21	Review insurers party to motion to dismiss for lack of personal jurisdiction.	.20	115.00
Leveridge, R.	5/10/21	Review comments from team on draft discovery (0.4); communication with co-plaintiffs re discovery (0.2).	.60	840.00
Leveridge, R.	5/10/21	Confer with R. Shore, J. Rubinstein and M. Rush discovery strategy (0.5); communicate with Debtors' counsel re same (0.1).	.60	840.00
Ogrey, S.	5/10/21	Continue drafting Document O for Insurers #31, #33, #34, #35.	1.00	230.00
Ogrey, S.	5/10/21	Draft insurer Document O for Insurers #2 and #4.	1.00	230.00
Ogrey, S.	5/10/21	Draft Document O for Insurer #26.	.40	92.00
Ogrey, S.	5/10/21	Draft Document O for Insurer #37.	.40	92.00
Ogrey, S.	5/10/21	Draft Document O for Insurer #12.	.40	92.00
Ogrey, S.	5/10/21	Draft Document O for Insurers #3, #6, #24, #39.	1.10	253.00
Sraders, S.	5/10/21	Revise draft requests to insurers for production.	3.60	2,070.00
Kaminsky, E.	5/10/21	Draft Document O re Insurer #36.	2.50	1,250.00
Kaminsky, E.	5/10/21	Draft Document O re Insurer #26.	1.80	900.00
Kaminsky, E.	5/10/21	Draft Document O re Insurer #9.	1.40	700.00
Kaminsky, E.	5/10/21	Revise Document O re Insurer #29.	1.80	900.00
Shore, R.	5/11/21	Review and revise requests for production.	.80	1,080.00
Hudson, J.	5/11/21	Confer with UCC (D. Windscheffel and A. Preis) re bankruptcy update and settlement invitation to insurers.	.10	72.50
Hudson, J.	5/11/21	Revise previous outline for litigation plan.	.20	145.00
Hudson, J.	5/11/21	Revise bankruptcy update and settlement invitation to insurers.	.30	217.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	5/11/21	Revise draft of supplemental personal jurisdiction discovery (1.2); review correspondence to insurers re document discovery (0.2); revise first set of requests for production to all insurers (0.4).	1.80	1,440.00
Rush, M.	5/11/21	Communicate with team re litigation plan.	.10	67.50
Johnson, K.	5/11/21	Research discovery procedures and service requirements (1.4); calendar objection deadlines (0.3); revise to-do list (0.4).	2.10	483.00
Gaske, A.	5/11/21	Draft supplemental discovery requests re personal jurisdiction.	1.70	977.50
Gaske, A.	5/11/21	Review and revise Document O for Insurer #9.	1.00	575.00
Leveridge, R.	5/11/21	Analyze discovery-related issues (1.4); communications with other plaintiffs' counsel re same (0.9).	2.30	3,220.00
Sraders, S.	5/11/21	Revise draft requests for production to incorporate comments from J. Hudson and R. Shore.	1.20	690.00
Kaminsky, E.	5/11/21	Draft document O re Insurer #23.	2.10	1,050.00
Shore, R.	5/12/21	Analyze various plan and adversary proceeding issues.	4.00	5,400.00
Hudson, J.	5/12/21	Confer with Debtors (P. Breene and A. Kramer) re status and strategy for adversary proceeding.	.70	507.50
Hudson, J.	5/12/21	Confer with Debtors (K. Benedict) re hearing on motion to seal.	.20	145.00
Hudson, J.	5/12/21	Revise settlement invitation letter to insurers.	.40	290.00
Rubinstein, J.	5/12/21	Review and revise Debtors' counsel proposed edits to draft of first set of discovery requests and supplemental personal jurisdiction discovery (1.8); confer with Debtors' counsel re strategy (0.7); review insurer proposed edits to protective order (0.8); analyze claim notice (0.3).	3.60	2,880.00
Rush, M.	5/12/21	Review draft protective order.	.40	270.00
Johnson, K.	5/12/21	Organize materials re motion to seal oral argument (2.1); draft table of contents for oral argument (0.5).	2.60	598.00
Johnson, K.	5/12/21	Communicate with K. Benedict re agenda information re motion to seal (0.2); review related documents (0.6); communicate with J. Hudson and M. Rush re same (0.2).	1.00	230.00
Johnson, K.	5/12/21	Revise May 2021 letter to insurers re April 6 transcript citations.	.60	138.00
Gaske, A.	5/12/21	Analyze coverage for Document O.	.50	287.50
Gaske, A.	5/12/21	Revise Document O for Insurers #23, #29, and #30.	2.60	1,495.00
Gaske, A.	5/12/21	Communicate with J. Hudson re letters to insurers.	.20	115.00



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Name	Date	Services	Hours	Amount
Gaske, A.	5/12/21	Revise discovery requests re personal jurisdiction pursuant to R. Leveridge and J. Rubinstein comments.	2.40	1,380.00
Leveridge, R.	5/12/21	Review and revise proposed protective order (0.7); communications with other plaintiffs' counsel re same (0.2).	.90	1,260.00
Leveridge, R.	5/12/21	Prepare for meeting with Debtors' counsel re various issues (0.4); participate in meeting with Debtors' counsel re same (0.8).	1.20	1,680.00
Leveridge, R.	5/12/21	Participate in meeting with Debtors' counsel re strategy issue re insurance coverage matter.	1.20	1,680.00
Leveridge, R.	5/12/21	Review and revise draft discovery requests to insurers.	1.90	2,660.00
Leveridge, R.	5/12/21	Communicate with team re preparation for hearing on motion to file under seal.	.40	560.00
Sraders, S.	5/12/21	Revise draft requests for production to incorporate comments from J. Rubinstein and P. Breene.	.50	287.50
Kaminsky, E.	5/12/21	Revise Document O re Insurer #29.	1.40	700.00
Shore, R.	5/13/21	Confer with R. Leveridge, J. Rubinstein, S. Sraders, A. Gaske, E. Kaminsky, and K. Johnson re status and upcoming tasks in adversary proceeding.	.60	810.00
Shore, R.	5/13/21	Review and revise correspondence re litigation and settlement.	.80	1,080.00
Hudson, J.	5/13/21	Review Document O to prepare for settlement negotiations.	.30	217.50
Hudson, J.	5/13/21	Communicate with Insurer #12 re settlement.	.30	217.50
Hudson, J.	5/13/21	Revise stipulation substituting defendant insurer with respect to certain policies.	.30	217.50
Hudson, J.	5/13/21	Revise outreach to insurers re discovery.	.10	72.50
Hudson, J.	5/13/21	Revise settlement invitation letter.	.70	507.50
Glaebberman, M.	5/13/21	Review status of document review in connection with personal jurisdiction motion to dismiss.	.50	150.00
Rubinstein, J.	5/13/21	Review proposed edits to first set of general requests for production and supplemental personal jurisdiction discovery requests (0.6); analyze substitution of insurer defendants (0.2); confer with litigation team re current projects and next steps (0.6); review non-arbitration, non-personal jurisdiction insurer correspondence re discovery meet-and-confer (0.3).	1.70	1,360.00
Rush, M.	5/13/21	Confer with J. Rubinstein, K. Johnson, A. Gaske, R. Leveridge, E. Kaminsky, and S. Sraders re litigation status and strategy.	.60	405.00

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Name	Date	Services	Hours	Amount
Rush, M.	5/13/21	Review letter from insurers re discovery.	.10	67.50
Johnson, K.	5/13/21	Revise contact list for May 2021 letter to insurers (3.2); revise citations re April 6, 2021 transcript in May 2021 letter to insurers (0.4).	3.60	828.00
Johnson, K.	5/13/21	Communicate with R. Leveridge re contact information for counsel to relevant insurers re jurisdictional discovery requests.	.30	69.00
Johnson, K.	5/13/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, M. Rush, E. Kaminsky, S. Sraders, and A. Gaske re adversary proceeding status and upcoming tasks.	.60	138.00
Gaske, A.	5/13/21	Review status of litigation discovery and related projects.	.30	172.50
Gaske, A.	5/13/21	Review letters to insurers.	.70	402.50
Gaske, A.	5/13/21	Revise letter to insurers.	1.20	690.00
Gaske, A.	5/13/21	Confer with team re adversary proceeding strategy.	.60	345.00
Gaske, A.	5/13/21	Review coverage for policies issued by Insurers #5 and #36 re Document O.	1.30	747.50
Gaske, A.	5/13/21	Revise and finalize discovery requests re personal jurisdiction pursuant to other firm comments.	1.50	862.50
Gaske, A.	5/13/21	Communicate with M. Glaebberman and M. Rush re status of document review.	.40	230.00
Leveridge, R.	5/13/21	Confer with team re insurance litigation status and strategy.	.60	840.00
Leveridge, R.	5/13/21	Review correspondence from non-moving insurer counsel re protective order and discovery issues (1.3); communications with Debtors' counsel re same (0.5).	1.80	2,520.00
Leveridge, R.	5/13/21	Finalize general discovery to insurers and additional jurisdiction discovery to certain insurers (2.5); communications with Debtors, UCC and insurer counsel re same (0.4).	2.90	4,060.00
Sraders, S.	5/13/21	Finalize draft requests for production.	.20	115.00
Sraders, S.	5/13/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, M. Rush, A. Gaske, E. Kaminsky, and K. Johnson re next steps and strategy for insurance adversary proceeding.	.60	345.00
Kaminsky, E.	5/13/21	Revise Document O re Insurers #7, #9 and #29.	3.00	1,500.00
Kaminsky, E.	5/13/21	Confer with litigation team re discovery strategy.	.60	300.00
Shore, R.	5/14/21	Confer with P. Breene, R. Leveridge, J. Rubinstein, and M. Rush re discovery issues, including status of protective order.	.60	810.00
Shore, R.	5/14/21	Review correspondence re discovery and comment on same.	1.50	2,025.00

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Name	Date	Services	Hours	Amount
Hudson, J.	5/14/21	Confer with litigation (R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, K. Johnson) and insurance team (D. Wolf, A. Gaske) re adversary proceeding status and strategy.	.40	290.00
Hudson, J.	5/14/21	Finalize settlement invitation letter to insurers.	.40	290.00
Rubinstein, J.	5/14/21	Analyze offensive discovery (0.5); analyze response to insurer meet-and-confer letter re defensive discovery (0.7); review proposed edits to party substitution papers (0.2); review correspondence from arbitration insurers re discovery (0.2); analyze protective order issues (0.9).	2.50	2,000.00
Rubinstein, J.	5/14/21	Confer with litigation (R. Leveridge, M. Rush, J. Hudson, E. Kaminsky, S. Sraders, K. Johnson) and insurance team (D. Wolf, A. Gaske) re adversary proceeding status and strategy.	.40	320.00
Wolf, D.	5/14/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, and A. Gaske re insurance recovery strategy.	.40	280.00
Rush, M.	5/14/21	Confer with P. Breene, R. Leveridge, J. Rubinstein, and R. Shore re discovery issues.	.60	405.00
Rush, M.	5/14/21	Draft protective order.	2.20	1,485.00
Rush, M.	5/14/21	Confer with litigation (R. Leveridge, J. Rubinstein, E. Kaminsky, S. Sraders, and K. Johnson) and insurance analysis team (D. Wolf, J. Hudson, and A. Gaske) re litigation status and strategy.	.40	270.00
Johnson, K.	5/14/21	Confer with litigation (R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, and K. Johnson) and insurance analysis team (D. Wolf and A. Gaske) re status and strategy.	.40	92.00
Johnson, K.	5/14/21	Confer with A. Bonesteel re e-discovery repository.	.80	184.00
Bonesteel, A.	5/14/21	Meet with K. Johnson re upcoming ediscovery phase.	.80	252.00
Gaske, A.	5/14/21	Confer with litigation (R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, and K. Johnson) and insurance analysis team (R. Shore, D. Wolf, and J. Hudson) re status and strategy.	.40	230.00
Gaske, A.	5/14/21	Draft insurer-specific letters re status of bankruptcy proceedings.	2.00	1,150.00
Gaske, A.	5/14/21	Revise individual letters to insurers.	4.70	2,702.50
Leveridge, R.	5/14/21	Confer with Debtors' counsel re protective order issues.	.60	840.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	5/14/21	Review letters re discovery from arbitration asserting insurers (0.5); draft response to same (1.7).	2.20	3,080.00
Leveridge, R.	5/14/21	Confer with team re outstanding projects and planning for discovery and other aspects of adversary proceeding.	.40	560.00
Leveridge, R.	5/14/21	Review communications from counsel for XL Switzerland re stipulation of substitution (0.4); communications with Debtors' counsel re same (0.2); communicate with counsel for XL re scheduling follow up call re same (0.1).	.70	980.00
Sraders, S.	5/14/21	Confer with litigation (R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, and K. Johnson) and insurance analysis team (J. Hudson, D. Wolf, and A. Gaske) re status and strategy.	.40	230.00
Kaminsky, E.	5/14/21	Revise Document O re Insurers #7, #9, and #29.	2.70	1,350.00
Kaminsky, E.	5/14/21	Confer with team re discovery and next steps in adversary proceeding.	.40	200.00
Rubinstein, J.	5/16/21	Review correspondence with insurer counsel re discovery issues (0.2); revise draft protective order (1.3).	1.50	1,200.00
Gaske, A.	5/16/21	Revise insurer correspondence tracking spreadsheet.	.20	115.00
Gaske, A.	5/16/21	Revise Document O re Insurers #5, #9, and #36.	2.20	1,265.00
Leveridge, R.	5/16/21	Review modified protective order and provide comments re same.	1.20	1,680.00
Leveridge, R.	5/16/21	Revise response to letter from arbitration asserting insurers re discovery to reflect comments from team (0.5); communications with Debtors' counsel re same (0.2); communicate with arbitration asserting insurers' counsel re same (0.2).	.90	1,260.00
Hudson, J.	5/17/21	Revise response to insurers' letter of May 13.	.20	145.00
Hudson, J.	5/17/21	Review correspondence re protective order.	.10	72.50
Rush, M.	5/17/21	Revise protective order.	.90	607.50
Rush, M.	5/17/21	Draft litigation plan.	.80	540.00
Rush, M.	5/17/21	Confer with insurers re discovery and protective order.	.50	337.50
Johnson, K.	5/17/21	Review docket re oppositions to motion to file under seal (0.1); communicate with K. Benedict and J. Hudson re agenda information re motion to seal (0.3).	.40	92.00
Johnson, K.	5/17/21	Communicate with team re discovery repository information (0.2); communicate with A. Bonesteel re follow-up discovery repository questions (0.1).	.30	69.00

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Name	Date	Services	Hours	Amount
Johnson, K.	5/17/21	Review and organize initial discovery documents (0.2); revise adversary proceeding to-do list (0.3).	.50	115.00
Gaske, A.	5/17/21	Draft insurer-specific letter re bankruptcy status for Insurer #31.	.60	345.00
Gaske, A.	5/17/21	Communicate with S. Ogrey re additional Document O.	.30	172.50
Leveridge, R.	5/17/21	Review draft protective order for adversary proceeding (0.7); communicate with Debtors' counsel re same (0.3); review proposed correspondence to non-moving insurers re discovery issues (0.8); prepare for and participate in meet-and-confer session with insurers re same (2.1).	3.90	5,460.00
Leveridge, R.	5/17/21	Communicate with team re protective order issues.	.40	560.00
Leveridge, R.	5/17/21	Review XL Switzerland re stipulation of substitution (0.7); communicate with Debtors' counsel re same (0.2); confer with counsel for XL and Debtors re same (0.4).	1.30	1,820.00
Ogrey, S.	5/17/21	Revise Document O for Insurers #3, #6, #24, and #39.	1.90	437.00
Ogrey, S.	5/17/21	Draft Document O for Insurers #1, #18, #19, and #20.	1.80	414.00
Ogrey, S.	5/17/21	Draft Document O for Insurers #11, #14, and #38.	.80	184.00
Ogrey, S.	5/17/21	Draft Document O for Insurers #10, #15, #27, and #28.	1.50	345.00
Kaminsky, E.	5/17/21	Draft document O re Insurer #3.	1.80	900.00
Hudson, J.	5/18/21	Analyze accessing coverage from Insurer #22.	.20	145.00
Hudson, J.	5/18/21	Review litigation plan.	.20	145.00
Rush, M.	5/18/21	Review draft protective order.	.20	135.00
Rush, M.	5/18/21	Draft litigation plan.	5.30	3,577.50
Rush, M.	5/18/21	Review opinion re motion to withdraw the reference in Diocese of Rockville Center case.	.60	405.00
Johnson, K.	5/18/21	Review docket re oppositions to motion to file under seal.	.10	23.00
Johnson, K.	5/18/21	Organize briefings and related cases in preparation of June 21, 2021 hearing (2.4); draft table of contents (1.2).	3.50	805.00
Gaske, A.	5/18/21	Communicate with S. Ogrey re Document O project.	.10	57.50
Leveridge, R.	5/18/21	Review case law provided by Debtors' counsel (0.7); communications with Debtors' counsel re same (0.4).	1.10	1,540.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	5/18/21	Communications with team re status of hearing on motion to file under seal in light of no objections.	.40	560.00
Leveridge, R.	5/18/21	Communications with Debtors' counsel re status of Debtors' review of proposed protective order.	.20	280.00
Ogrey, S.	5/18/21	Review all drafted Document Os to ensure all policies and values were accurately represented.	.80	184.00
Ogrey, S.	5/18/21	Draft Document O for certain insurers.	.20	46.00
Ogrey, S.	5/18/21	Draft Document O for Insurer #32.	.30	69.00
Ogrey, S.	5/18/21	Revise Document O for Insurers #7 and #8 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurer #9 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurers #31, #33, #34, and #35 to include summary of policies.	.20	46.00
Ogrey, S.	5/18/21	Revise Document O for Insurer #14 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurer #12 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurers #2 and #4 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurers #16 and #17 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurer #13 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurer #25 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurer #26 to include summary of policies.	.10	23.00
Ogrey, S.	5/18/21	Revise Document O for Insurer #37 to include summary of policies.	.20	46.00
Colcock, S.	5/18/21	Review communications re motion to seal objections and discovery motions.	.20	66.00
Kaminsky, E.	5/18/21	Analyze insurance recovery strategy re Insurer #22.	.20	100.00
Kaminsky, E.	5/18/21	Draft Document O re insurer #3.	2.60	1,300.00
Kaminsky, E.	5/18/21	Draft Document O re Insurer #3.	1.30	650.00
Kaminsky, E.	5/18/21	Draft Document O the Insurer #6.	1.60	800.00
Kaminsky, E.	5/18/21	Draft Document O re Insurer #3.	1.60	800.00
Hudson, J.	5/19/21	Prepare for hearing on motions for more definite statement.	.10	72.50
Hudson, J.	5/19/21	Coordinate preparation of policy evidence for production.	.40	290.00

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Name	Date	Services	Hours	Amount
Hudson, J.	5/19/21	Analyze litigation strategy.	.10	72.50
Girgenti, J.	5/19/21	Communicate with A. Bonesteel re insurance policy review.	.10	36.50
Rubinstein, J.	5/19/21	Review materials in preparation for hearing re motion to seal (1.0); review recent decision re withdraw of reference issue (1.0); review edits to proposed protective order (0.3); correspond with insurer counsel re discovery and review of SOFA (0.9); analyze litigation plan and offensive discovery (1.0); review UK insurer reply re personal jurisdiction motion (0.3).	4.50	3,600.00
Rush, M.	5/19/21	Draft litigation plan.	6.30	4,252.50
Johnson, K.	5/19/21	Review docket re notice of agenda for upcoming hearing (0.2); update case calendar (0.2).	.40	92.00
Johnson, K.	5/19/21	Organize briefings and related cases in preparation for June 21, 2021 hearing (2.5); draft table of contents (2.0); communicate with S. Colcock re same (0.3); communicate with R. Leveridge and J. Hudson re same (0.1).	4.90	1,127.00
Bonesteel, A.	5/19/21	Review policies in preparation for production.	3.50	1,102.50
Gaske, A.	5/19/21	Communicate with A. Bonesteel re production of policies.	.20	115.00
Leveridge, R.	5/19/21	Review materials in preparation for hearing on motion to file under seal (2.1); communications with co-plaintiffs' counsel re same (0.6).	2.70	3,780.00
Leveridge, R.	5/19/21	Communications with team re legal research relevant to motion to withdraw the reference.	.60	840.00
Leveridge, R.	5/19/21	Communications with team re production of policies to insurers (0.3); communications with Debtors' counsel re same (0.3).	.60	840.00
Leveridge, R.	5/19/21	Communications with team re preparation of materials for 6/21 hearing on motions to dismiss re personal jurisdiction.	.30	420.00
Leveridge, R.	5/19/21	Review draft litigation plan.	1.10	1,540.00
Ogrey, S.	5/19/21	Compare Debtors' list of insurance policies against exhibit to complaint to determine which policies were missing from list of policies.	2.20	506.00
Colcock, S.	5/19/21	Communicate with S. Ogrey re Debtors' insurance policy list.	.20	66.00
Colcock, S.	5/19/21	Begin drafting list of more definite statement cases for upcoming hearing.	3.10	1,023.00
Kaminsky, E.	5/19/21	Research recovery process re Insurer #22.	2.10	1,050.00

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Name	Date	Services	Hours	Amount
Shore, R.	5/20/21	Communicate with R. Leveridge, J. Rubinstein, M. Rush, A. Gaske, S. Sradars, S. Colcock, and K. Johnson re case updates.	.60	810.00
Hudson, J.	5/20/21	Confer with UCC (A. Preis) re settlement invitation letters.	.10	72.50
Hudson, J.	5/20/21	Communicate with Insurer #11 on potential settlement.	.10	72.50
Hudson, J.	5/20/21	Analyze litigation plan and next steps for coverage litigation.	1.20	870.00
Hudson, J.	5/20/21	Review research re Issue #22.	.10	72.50
Hudson, J.	5/20/21	Confer with litigation team re strategy.	.50	362.50
Hudson, J.	5/20/21	Confer with Debtors (A. Kramer) re next steps for Insurer #22.	.10	72.50
Girgenti, J.	5/20/21	Research re Issue #22.	1.10	401.50
Girgenti, J.	5/20/21	Draft spreadsheet reflecting policy provisions in insurance policies related to Issue #52.	2.30	839.50
Girgenti, J.	5/20/21	Review and analyze KCIC reports and all insurance policies to identify key provisions related to Issue #52.	2.20	803.00
Rubinstein, J.	5/20/21	Attend May 20 court hearing (2.0); communicate with team re argument re motion to seal (0.2); revise agenda for litigation strategy meeting (0.2); analyze litigation strategy (1.6); analyze Issue #22 (1.0); begin review of personal jurisdiction and arbitration reply briefs (1.5).	6.50	5,200.00
Rush, M.	5/20/21	Confer with J. Hudson, R. Leveridge, J. Rubinstein, K. Johnson, S. Colcock, S. Sradars, E. Kaminsky, and A. Gaske re case status and strategy.	.50	337.50
Rush, M.	5/20/21	Revise litigation plan.	1.50	1,012.50
Johnson, K.	5/20/21	Confer with R. Leveridge, M. Rush, J. Rubinstein, J. Hudson, E. Kaminsky, S. Sradars, A. Gaske and S. Colcock re litigation status and strategy.	.50	115.00
Johnson, K.	5/20/21	Organize briefings and related cases in preparation for June 21, 2021 hearing.	2.90	667.00
Johnson, K.	5/20/21	Review docket re insurer replies (0.2); organize same and circulate to team (0.8).	1.00	230.00
Bonesteel, A.	5/20/21	Review vendor pricing proposal re document production.	.50	157.50
Bonesteel, A.	5/20/21	Review policy documents in preparation for production of same.	2.50	787.50
Gaske, A.	5/20/21	Review letter to Insurer #30 (0.2); communicate with Reed Smith re same (0.2).	.40	230.00



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Name	Date	Services	Hours	Amount
Gaske, A.	5/20/21	Review reply briefs re motion to dismiss for lack of personal jurisdiction.	.30	172.50
Gaske, A.	5/20/21	Confer with R. Leveridge, J. Rubinstein, M. Rush, J. Hudson, S. Sraders, E. Kaminsky, K. Johnson, and S. Colcock re adversary proceeding strategy.	.50	287.50
Lyle, R.	5/20/21	Review policy provisions re Issue #52.	1.20	372.00
Lyle, R.	5/20/21	Research statutes and case law re Issue #52.	1.50	465.00
Leveridge, R.	5/20/21	Prepare for and participate in hearing on motion to file under seal (2.8); communications with insurer counsel and co-plaintiffs' counsel re same (0.5).	3.30	4,620.00
Leveridge, R.	5/20/21	Review litigation plan (1.0); confer with litigation team re current status of projects and strategy (0.5).	1.50	2,100.00
Leveridge, R.	5/20/21	Communicate with Debtors' counsel re discovery-related issues.	.30	420.00
Leveridge, R.	5/20/21	Review communications with Debtors' counsel re document repository.	.20	280.00
Sraders, S.	5/20/21	Review personal jurisdiction replies filed by insurer defendants.	.40	230.00
Sraders, S.	5/20/21	Confer with litigation team re confidentiality agreements, discovery, and strategy moving forward.	.50	287.50
Colcock, S.	5/20/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, M. Rush, A. Gaske, S. Sraders and K. Johnson re case updates.	.50	165.00
Colcock, S.	5/20/21	Continue organizing more definite statement cases for upcoming hearing.	4.00	1,320.00
Kaminsky, E.	5/20/21	Confer with team re adversary proceeding next steps and discovery issues.	.50	250.00
Kaminsky, E.	5/20/21	Research Issue #52.	2.40	1,200.00
Shore, R.	5/21/21	Confer with insurance and litigation teams re insurance recovery strategy.	.90	1,215.00
Shore, R.	5/21/21	Review insurer responses to outreach letters.	.30	405.00
Hudson, J.	5/21/21	Confer with Debtors (P. Breene and R. Hoff) re policy evidence for production.	.30	217.50
Hudson, J.	5/21/21	Confer with insurance and litigation teams re next steps for insurance recovery.	.90	652.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	5/21/21	Continue review of insurer reply submissions re personal jurisdiction, more definite statement, arbitration, lift stay, and withdraw of reference (4.2); confer with litigation (R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, and K. Johnson) and insurance team (R. Shore, D. Wolf and A. Gaske) re status and strategy (0.9); review discovery correspondence from insurer counsel and analysis re response to same (0.4); review recent decision re withdraw of reference (0.2).	5.70	4,560.00
Wolf, D.	5/21/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, S. Sraders, A. Gaske, E Kaminsky, and K. Johnson re insurance recovery strategy.	.90	630.00
Rush, M.	5/21/21	Review insurers' reply briefs.	1.80	1,215.00
Rush, M.	5/21/21	Confer with insurance and litigation teams re next steps for insurance recovery.	.90	607.50
Johnson, K.	5/21/21	Review court docket re insurer replies.	.30	69.00
Johnson, K.	5/21/21	Confer with litigation team (R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, and J. Hudson) and insurance team (R. Shore, D. Wolf, and A. Gaske) re status and strategy.	.90	207.00
Johnson, K.	5/21/21	Continue organizing briefings and related cases in preparation for June 21, 2021 hearing (2.2); revise table of contents (2.5).	4.70	1,081.00
Bonesteel, A.	5/21/21	Communicate with counsel re policies and preparations for production.	.70	220.50
Bonesteel, A.	5/21/21	Continue reviewing policies for production.	1.20	378.00
Gaske, A.	5/21/21	Confer with insurance and litigation teams re next steps for insurance recovery.	.90	517.50
Lyle, R.	5/21/21	Continue research re Issue #52.	3.80	1,178.00
Leveridge, R.	5/21/21	Review correspondence from insurers re discovery (0.8); communication with Debtors' counsel re same (0.2); confer with team re insurance strategy (0.9).	1.90	2,660.00
Leveridge, R.	5/21/21	Review reply briefs re personal jurisdiction and withdrawal of the reference.	1.80	2,520.00
Leveridge, R.	5/21/21	Communicate with Debtors' counsel re status of protective order (0.4); review email from insurer counsel re same (0.4).	.80	1,120.00
Leveridge, R.	5/21/21	Communications with Debtors' counsel re providing policies at issue to insurers for purposes of stipulation (0.2); communications with team re comparison of policies to be produced by Debtors with those in Gilbert's possession (0.4).	.60	840.00

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Name	Date	Services	Hours	Amount
Ogrey, S.	5/21/21	Draft list of cases contained in more definite statement documents from Allied World, Liberty Europe, and XL Bermuda's replies.	1.00	230.00
Ogrey, S.	5/21/21	Communicate with A. Bonesteel and S. Colcock re policy production analysis.	.20	46.00
Sraders, S.	5/21/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, D. Wolf, M. Rush, E. Kaminsky, A. Gaske, and K. Johnson re strategy for insurance recovery.	.90	517.50
Colcock, S.	5/21/21	Finish organizing cases re more definite statement for upcoming hearing.	2.70	891.00
Kaminsky, E.	5/21/21	Analyze next steps in adversary proceeding.	.80	400.00
Kaminsky, E.	5/21/21	Research Issue #52.	4.40	2,200.00
Kaminsky, E.	5/21/21	Research question re recovery from Insurer #22.	1.10	550.00
Kaminsky, E.	5/21/21	Draft memorandum re Issue #52.	.70	350.00
Leveridge, R.	5/22/21	Review Boca Raton claim referenced by insurers.	.60	840.00
Kaminsky, E.	5/22/21	Research Issue #52.	1.90	950.00
Kaminsky, E.	5/22/21	Draft memorandum re Issue #52.	.90	450.00
Shore, R.	5/23/21	Revise draft to insurers re GL policies.	.50	675.00
Hudson, J.	5/23/21	Revise response to insurers' meet-and-confer assertions re coverage.	.20	145.00
Rubinstein, J.	5/23/21	Draft correspondence to insurer counsel re discovery, specifically addressing Boca Raton claim.	1.20	960.00
Leveridge, R.	5/23/21	Draft response to non-moving insurers re claims at issue (0.9); review edits to draft response (0.4); communications with Debtors' counsel re same (0.3).	1.60	2,240.00
Kaminsky, E.	5/23/21	Draft memorandum re Issue #52.	1.90	950.00
Shore, R.	5/24/21	Review and comment on revised protective order (0.5); communicate with P. Breene re same (0.3).	.80	1,080.00
Hudson, J.	5/24/21	Review status of research on Issue #52.	.10	72.50
Hudson, J.	5/24/21	Revise response to insurers' meet-and-confer assertions re coverage.	.90	652.50
Girgenti, J.	5/24/21	Communicate with J. Hudson, E. Kaminsky, and R. Lyle re research related to Issue #52.	.20	73.00
Rubinstein, J.	5/24/21	Revise draft protective order circulated by Debtors' counsel (1.5); analyze response to insurer correspondence re discovery issues (1.6); analyze issue implicated by personal jurisdiction insurer reply briefs (0.3); analyze Issue #22 (1.6).	5.00	4,000.00

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Name	Date	Services	Hours	Amount
Sanchez, J.	5/24/21	Confer with team re status of briefing on jurisdictional issue.	.10	37.50
Rush, M.	5/24/21	Review draft protective order.	.30	202.50
Johnson, K.	5/24/21	Continue organizing briefings and related cases (1.0); draft table of contents in preparation for June 21, 2021 hearing re motion for more definite statement and motion for personal jurisdiction (1.0).	2.00	460.00
Bonesteel, A.	5/24/21	Review policies and prepare for production.	5.00	1,575.00
Lyle, R.	5/24/21	Continue research re Issue #52.	4.30	1,333.00
Leveridge, R.	5/24/21	Review communications with insurers re discovery (0.8); communications with Debtors' counsel re same (0.4); review updated draft of protective order (0.8); revise same (1.1); communications with Debtors' counsel re same (0.3).	3.40	4,760.00
Colcock, S.	5/24/21	Prepare 14 policies for production.	1.20	396.00
Kaminsky, E.	5/24/21	Continue researching Issue #52.	2.60	1,300.00
Kaminsky, E.	5/24/21	Revise Document O re Insurer #3.	1.90	950.00
Shore, R.	5/25/21	Confer with litigation team re adversary proceeding strategy (0.5); confer with P. Breene re same (0.8); review and revise communications with insurers (1.5); confer with insurance and bankruptcy teams re various plan / disclosure statement issues (1.8); confer with Debtors' counsel re same (0.4 ).	5.00	6,750.00
Hudson, J.	5/25/21	Review draft materials from Debtors to be sent to Insurer #22.	.10	72.50
Hudson, J.	5/25/21	Revise response to insurers' May 24 meet-and-confer correspondence.	.50	362.50
Hudson, J.	5/25/21	Prepare for oral argument on motions for more definite statement.	.20	145.00
Hudson, J.	5/25/21	Review policy comparison analysis to prepare for production.	.70	507.50
Girgenti, J.	5/25/21	Communications with J. Rubinstein and J. Hudson re Purdue insurance policies related to Issue #22.	.10	36.50
Girgenti, J.	5/25/21	Review and identify key exemplar policies related to Issue #22.	1.10	401.50
Rubinstein, J.	5/25/21	Revise draft correspondence to insurer counsel re discovery issues (1.2); analyze Issue #22 (2.2); analyze reply briefs (0.5).	3.90	3,120.00
Rush, M.	5/25/21	Analyze discovery issues and strategy.	.80	540.00
Johnson, K.	5/25/21	Finalize organization of briefings and related cases (0.8); finalize table of contents for June 21, 2021 hearing re motion for more definite statement and motion for personal jurisdiction (1.1).	1.90	437.00

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Name	Date	Services	Hours	Amount
Johnson, K.	5/25/21	Review docket and calendar related upcoming hearings.	.20	46.00
Johnson, K.	5/25/21	Review and organize relevant pleadings for upcoming hearings.	.80	184.00
Bonesteel, A.	5/25/21	Review policies and prepare for production.	7.60	2,394.00
Gaske, A.	5/25/21	Review S. Sraders summary of cases cited in personal jurisdiction reply briefs.	.10	57.50
Lyle, R.	5/25/21	Confer with E. Kaminsky re Issue #52.	.20	62.00
Leveridge, R.	5/25/21	Revise response to arbitration asserting insurers' letter of 5/24 re discovery (2.1); communications with co-plaintiffs' counsel re same (0.2); communication with insurer counsel re same (0.4).	2.70	3,780.00
Leveridge, R.	5/25/21	Review draft communication from Debtors' counsel to non-moving insurers' counsel re discovery (0.7); review final communication to insurers re same (0.5).	1.20	1,680.00
Leveridge, R.	5/25/21	Analyze comparison of policies at issue to provide to insurers.	.40	560.00
Sraders, S.	5/25/21	Research cases cited by insurers in reply briefs.	.30	172.50
Colcock, S.	5/25/21	Prepare 30 insurance policies for production.	5.60	1,848.00
Kaminsky, E.	5/25/21	Research insurance policy exclusion.	.60	300.00
Kaminsky, E.	5/25/21	Research recovery re Insurer #22.	.90	450.00
Kaminsky, E.	5/25/21	Draft document O re Insurer #37.	1.40	700.00
Kaminsky, E.	5/25/21	Draft Document O re Insurer #4.	2.40	1,200.00
Shore, R.	5/26/21	Confer with litigation team re insurance adversary proceeding strategy.	.50	675.00
Shore, R.	5/26/21	Confer with Debtors' counsel re settlement next steps.	.20	270.00
Hudson, J.	5/26/21	Review next steps in light of Judge Drain's comments on motion to seal.	.10	72.50
Hudson, J.	5/26/21	Prepare for insurance team meeting.	.10	72.50
Hudson, J.	5/26/21	Review policy comparison analysis to prepare for production.	.20	145.00
Hudson, J.	5/26/21	Analyze next steps for recovery from Insurer #22.	.10	72.50
Hudson, J.	5/26/21	Communicate with team re tracking and reviewing insurer productions.	.10	72.50
Hudson, J.	5/26/21	Prepare for oral argument on motions for more definite statement.	.50	362.50
Girgenti, J.	5/26/21	Communications with J. Rubinstein and J. Hudson re research re Issue #22.	.10	36.50
Girgenti, J.	5/26/21	Review and identify prior research related to Issue #22.	.30	109.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	5/26/21	Analysis re discovery correspondence with insurer counsel and sealing of documents submitted to court (0.8); review correspondence to insurer counsel re proposed protective order (0.2); review insurer correspondence re Navigators policy production (0.2); review policies re Issue #22 (2.5).	3.70	2,960.00
Johnson, K.	5/26/21	Finalize briefings and related cases for June 21, 2021 hearing re motion for more definite statement and motion for personal jurisdiction.	1.80	414.00
Johnson, K.	5/26/21	Review status of pending projects (0.2); confer with S. Colcock re preparing for upcoming hearings (0.2).	.40	92.00
Johnson, K.	5/26/21	Organize policy production related to Insurer #25.	.30	69.00
Johnson, K.	5/26/21	Review and organize recent incoming mailings.	.10	23.00
Bonesteel, A.	5/26/21	Continue reviewing policies in preparation for production.	5.50	1,732.50
Gaske, A.	5/26/21	Analyze reply briefs and accompanying affidavits submitted by insurers moving to dismiss for lack of personal jurisdiction.	1.30	747.50
Leveridge, R.	5/26/21	Review reply briefs submitted by insurers.	1.80	2,520.00
Leveridge, R.	5/26/21	Review transcript of 5/20 hearing (0.5); review communication re reaching out to arbitration asserting insurers re approach to sealing material asserted to be confidential by insurers (0.2); communications with Debtors' counsel re same (0.2); communications with arbitration asserting insurers re same (0.3).	1.20	1,680.00
Leveridge, R.	5/26/21	Review communications from non-moving insurers re schedule (0.3); communications with co-plaintiffs re same (0.2); respond to non-moving insurers (0.4).	.90	1,260.00
Sraders, S.	5/26/21	Research re cases cited in insurer reply briefs.	1.00	575.00
Colcock, S.	5/26/21	Confer with K. Johnson re preparation for upcoming hearing on insurer motions.	.20	66.00
Kaminsky, E.	5/26/21	Draft Document O re Insurer #24.	4.00	2,000.00
Shore, R.	5/27/21	Confer with litigation team re strategy re argument on preliminary motions, including analyze issues and arguments.	1.10	1,485.00
Hudson, J.	5/27/21	Confer with litigation team re reply briefs and preparing for oral argument on insurers' initial motions.	1.10	797.50
Girgenti, J.	5/27/21	Communications with J. Rubinstein and J. Hudson re research re Issue #22.	.10	36.50

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Rubinstein, J.	5/27/21	Analyze W.D.Pa. decision re insurance coverage for opioid claims (0.5); correspond with K. Johnson re courtesy copies of briefing to Judge Drain (0.5); confer with team re June 21 oral argument (1.1); provide comments on e-discovery vendor pricing quote (0.5); communications with insurer counsel re meet and confer sessions (0.4); analyze re Issue #22 (0.3); analyze re motion to withdraw reference (0.2); revise trial preparation outline (0.4).	3.90	3,120.00
Wolf, D.	5/27/21	Revise settlement agreements re assignment of insurance rights.	1.20	840.00
Rush, M.	5/27/21	Review insurers' reply briefs.	.80	540.00
Rush, M.	5/27/21	Confer with litigation team re personal jurisdiction motions and oral argument strategy.	1.10	742.50
Rush, M.	5/27/21	Confer with insurance team re next steps for insurance recovery.	.40	270.00
Johnson, K.	5/27/21	Draft tables re personal jurisdiction motion and motion on more definite statement in support of materials to send to Judge Drain for June 21 hearing.	.80	184.00
Johnson, K.	5/27/21	Revise coverage charts and highlight personal jurisdiction insurers.	1.50	345.00
Bonesteel, A.	5/27/21	Review vendor pricing proposal re document production.	.90	283.50
Bonesteel, A.	5/27/21	Review policies in preparation for production.	1.00	315.00
Gaske, A.	5/27/21	Review tailored coverage charts re preparation for oral argument.	.80	460.00
Gaske, A.	5/27/21	Analyze case law related to retention of U.S. counsel re personal jurisdiction.	.30	172.50
Gaske, A.	5/27/21	Confer with litigation team re reply briefs re motion to dismiss for lack of personal jurisdiction and motion for a more definite statement.	1.10	632.50
Gaske, A.	5/27/21	Analyze reply briefs re motion for a more definite statement.	.50	287.50
Gaske, A.	5/27/21	Revise Document O for Insurer #6.	2.20	1,265.00
Leveridge, R.	5/27/21	Review material in preparation for oral argument on 6/21.	1.80	2,520.00
Leveridge, R.	5/27/21	Communicate with Debtors' counsel re coordinating argument on insurer motions to be heard 6/21 (0.4); review communications from Debtors' counsel and Court re materials required for hearing (0.5).	.90	1,260.00

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Leveridge, R.	5/27/21	Confer with litigation team re preparation for argument on motion to be heard on 6/21 (1.1); review status of other projects re adversary proceeding (0.4).	1.50	2,100.00
Leveridge, R.	5/27/21	Communicate with Debtors' counsel re insurers' motion to withdraw the reference (0.6); review Judge's rules (0.2).	.80	1,120.00
Sraders, S.	5/27/21	Confer with M. Rush and A. Gaske re personal jurisdiction cases re attorney retention.	.20	115.00
Sraders, S.	5/27/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, M. Rush, A. Gaske, and E. Kaminsky re insurers' reply briefs and strategize responses.	1.10	632.50
Sraders, S.	5/27/21	Research re jurisdictional issues raised in reply briefs.	.60	345.00
Colcock, S.	5/27/21	Confer with R. Shore, J. Hudson, D. Wolf, A. Gaske, R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, and K. Johnson) re status and strategy.	.40	132.00
Kaminsky, E.	5/27/21	Revise document O re Insurer #6.	.80	400.00
Kaminsky, E.	5/27/21	Review reply briefs in preparation for hearing on motions.	1.90	950.00
Kaminsky, E.	5/27/21	Draft document O re Insurer #33.	3.80	1,900.00
Kaminsky, E.	5/27/21	Draft argument preparation memorandum re motion for more definite statement.	.50	250.00
Kaminsky, E.	5/27/21	Prepare for meeting with Debtors' counsel re Insurer #22.	1.00	500.00
Shore, R.	5/28/21	Communicate with litigation team re strategy and discovery issues.	.40	540.00
Hudson, J.	5/28/21	Review research re Issue #22.	.20	145.00
Hudson, J.	5/28/21	Confer with Debtors (P. Breene and A. Kramer) re policy evidence for production.	.40	290.00
Girgenti, J.	5/28/21	Research re Issue #22.	3.20	1,168.00
Rubinstein, J.	5/28/21	Analyze courtesy copy submission of pleadings to Court in advance of June 21 hearing (0.7); analyze request for oral argument re motion to withdraw reference (0.7); analyze Issue #22 (0.3); annotate personal jurisdiction reply memorandum in preparation for June 21 hearing (1.0); analyze initial insurer productions (0.6).	3.30	2,640.00
Wolf, D.	5/28/21	Revise settlement agreements re insurance coverage matters.	1.60	1,120.00
Bonesteel, A.	5/28/21	Review policies in preparation for production.	1.00	315.00
Gaske, A.	5/28/21	Revise Document O for Insurers #3, #24, and #27.	3.90	2,242.50



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Name	Date	Services	Hours	Amount
Leveridge, R.	5/28/21	Draft report re discovery for Court.	2.50	3,500.00
Leveridge, R.	5/28/21	Review D. Mahoney declaration.	.40	560.00
Leveridge, R.	5/28/21	Analyze strategy re motion to withdraw (0.6); communicate with Debtors' counsel re same (0.2).	.80	1,120.00
Leveridge, R.	5/28/21	Review communications from insurer counsel re policy information.	.60	840.00
Leveridge, R.	5/28/21	Communicate with team re claim valuation.	.40	560.00
Sraders, S.	5/28/21	Draft summary of cases re jurisdictional analysis related to retention of counsel.	1.30	747.50
Colcock, S.	5/28/21	Revise table of authorities for more definite statement briefs and motions to dismiss for lack of personal jurisdiction in preparation for sending to Judge Drain.	.40	132.00
Kaminsky, E.	5/28/21	Continue drafting document O re Insurer #33.	2.50	1,250.00
Kaminsky, E.	5/28/21	Draft memorandum re motion for more definite statement argument.	2.80	1,400.00
Kaminsky, E.	5/28/21	Draft document O re Insurer #6.	.90	450.00
Kaminsky, E.	5/28/21	Draft document O re Insurer #35	1.30	650.00
Kaminsky, E.	5/29/21	Continue drafting document O re Insurer #35.	2.00	1,000.00
Kaminsky, E.	5/30/21	Draft memorandum re motion for more definite statement argument.	1.50	750.00
Shore, R.	5/31/21	Review policies for adversary proceeding.	2.00	2,700.00
Kaminsky, E.	5/31/21	Continue drafting memorandum re motion for more definite statement.	2.20	1,100.00
<b>Project Total:</b>			<b>709.40</b>	<b>\$ 475,382.00</b>
<b>TOTAL CHARGEABLE HOURS</b>			<b>1,131.70</b>	
<b>TOTAL FEES</b>				<b>\$ 916,366.50</b>

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#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	5.00	850.00	4,250.00
Gilbert, S.	117.30	1,700.00	199,410.00
Quinn, K.	31.00	1,100.00	34,100.00
Shore, R.	62.80	1,350.00	84,780.00
Litherland, C.	22.00	1,400.00	30,800.00
Holland, P.	1.90	290.00	551.00
Hudson, J.	103.70	725.00	75,182.50
Girgenti, J.	10.80	365.00	3,942.00
Glaebberman, M.	13.70	300.00	4,110.00
Grim, E.	43.10	700.00	30,170.00
Rubinstein, J.	81.00	800.00	64,800.00
Wolf, D.	28.30	700.00	19,810.00
Jones, T.	11.10	300.00	3,330.00
Sanchez, J.	18.90	375.00	7,087.50
Rush, M.	52.50	675.00	35,437.50
Johnson, K.	80.50	230.00	18,515.00
Bonesteel, A.	30.20	315.00	9,513.00
Gaske, A.	65.00	575.00	37,375.00
Lyle, R.	15.10	310.00	4,681.00
Leveridge, R.	100.00	1,400.00	140,000.00
Ogrey, S.	27.60	230.00	6,348.00
Sraders, S.	69.30	575.00	39,847.50
Colcock, S.	44.30	330.00	14,619.00
Jennings, R.	7.90	425.00	3,357.50
Kaminsky, E.	88.70	500.00	44,350.00
<b>TOTALS</b>	<b>1,131.70</b>		<b>\$ 916,366.50</b>

#### TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	21.50	15,775.00
A004	Case Administration	4.00	4,247.50
A006	Employment / Fee Applications	2.80	1,181.00
A009	Meetings / Communications with AHC & Cre	39.10	47,460.00
A015	Non-Working Travel (Billed @ 50%)	5.00	4,250.00
A019	Plan of Reorganization / Disclosure Statement	349.90	368,071.00
A020	Insurance Adversary Proceeding	709.40	475,382.00

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## EXPENSE DETAILS

### E105: Telephone

Date	Description	Task	Amount
5/20/21	Conference Call / Court Solutions / R. Leveridge / Attend Hearing / 05.20.2021	E105	70.00
	<b>Sub-Total of Expenses:</b>		<b>\$ 70.00</b>

### E106: Online Research

Date	Description	Task	Amount
5/03/21	Lexis	E106	61.06
5/20/21	Lexis	E106	61.07
5/31/21	Westlaw	E106	1,956.14
5/31/21	PACER	E106	365.40
	<b>Sub-Total of Expenses:</b>		<b>\$ 2,443.67</b>

### E107: Delivery Services/Messenger

Date	Description	Task	Amount
5/04/21	Messenger & Delivery / FedEx Overnight / Hon. Robert Drain (US Bankruptcy Court of NY) / 5.4.21	E107	77.08
	<b>Sub-Total of Expenses:</b>		<b>\$ 77.08</b>

**TOTAL EXPENSES** **\$ 2,590.75**

**TOTAL FEES AND EXPENSES** **\$ 918,957.25**